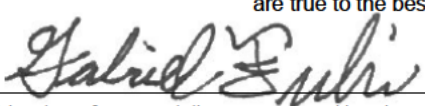


UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 13-CA-296145	Date Filed 5-20-2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer  Starbucks Corporation	b. Tel. No. (206) 318-2212
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code)  1174 E. 55 <sup>th</sup> St, Chicago, IL 60615	e. Employer Representative  Howard Schultz, CEO
	g. e-mail hschultz@starbucks.com
	h. Number of workers employed 19
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  Please see attached	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United	
4a. Address (Street and number, city, state, and ZIP code)  Workers United 22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.   (signature of representative or person making charge) Barnard Iglitzin & Lavitt LLP 18 West Mercer St., Ste. 400 Address Seattle, WA 98119	
Gabe Frumkin, Attorney (Print/type name and title or office, if any)	
Date 05/19/2022	
Tel. No. (206) 257-6012	
Office, if any, Cell No.	
Fax No. (206) 378-4132	
e-mail frumkin@workerlaw.com	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## Attachment

### 2. Basis of the Charge

Within the last six months, the Employer has engaged in unlawful conduct that has a tendency to restrain employees in their exercise of their Section 7 rights by, among other things, doing the following:

1. Discriminating against an employee who is a known union supporter by issuing discipline in a discriminatory manner.
2. Making implied and actual threats against an employee.
3. Making implied threats by telling an employee that if they hate the Employer, then they should quit their employment for the Employer.
4. Interrogating an employee about union activity and/or soliciting grievances.
5. Impliedly promising a grant of benefit if the employee rejects unionization.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

May 20, 2022

Howard Schultz, CEO  
Starbucks Corporation  
1174 East 55th Street  
Chicago, IL 60615

Re: Starbucks Corporation  
Case 13-CA-296145

Dear Mr. Schultz:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner Christopher J. Lee whose telephone number is (312)353-9777 and email address is [Christopher.Lee@nlrb.gov](mailto:Christopher.Lee@nlrb.gov). If this Board agent is not available, you may contact Supervisor Field Examiner Joyce A. Hofstra whose telephone number is (312)353-7609.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge by June 3, 2022. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent and providing all relevant documentary evidence requested by the Board

agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlrb.gov](http://www.nlrb.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

**/s/Paul Hitterman**

Paul Hitterman  
Acting Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

May 20, 2022

Workers United  
22 South 22nd St.  
Philadelphia, PA 19103-3005

Re: Starbucks Corporation  
Case 13-CA-296145

Dear Sir or Madam:

The charge that you filed in this case on May 20, 2022 has been docketed as case number 13-CA-296145. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner Christopher J. Lee whose telephone number is (312)353-9777 and email address is [Christopher.Lee@nlrb.gov](mailto:Christopher.Lee@nlrb.gov). If this Board agent is not available, you may contact Supervisor Field Examiner Joyce A. Hofstra whose telephone number is (312)353-7609.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

*/s/Paul Hitterman*

Paul Hitterman  
Acting Regional Director

cc: Gabe Frumkin, Attorney  
Barnard Iglitzin & Lavitt LLP  
18 W Mercer St., Ste 400  
Seattle, WA 98119



NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

STARBUCKS CORPORATION
and
WORKERS UNITED/SEIU

CASE 13-CA-296145

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: <u>Noah G. Lipschultz</u>	
MAILING ADDRESS: <u>1300 IDS Center, 80 S. 8th Street, Minneapolis, MN 55402</u>	
E-MAIL ADDRESS: <u>nlipschultz@littler.com</u>	
OFFICE TELEPHONE NUMBER: <u>612-630-1000</u>	
CELL PHONE NUMBER: _____	FAX: _____
SIGNATURE: <u>s/ Noah G. Lipschultz</u>	
(Please sign in ink.)	
DATE: <u>May 31, 2022</u>	

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

STARBUCKS CORPORATION
and
WORKERS UNITED/SEIU

CASE 13-CA-296145

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Alice D. Kirkland	
MAILING ADDRESS: 1300 IDS Center, 80 S. 8th Street, Minneapolis, MN 55402	
E-MAIL ADDRESS: akirkland@littler.com	
OFFICE TELEPHONE NUMBER: 612-630-1000	
CELL PHONE NUMBER:	FAX:
SIGNATURE: s/ Alice D. Kirkland	
DATE: May 31, 2022 (Please sign in ink.)	

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Starbucks Corporation
and
Workers United/SEIU

CASE 13-CA-296145

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Elizabeth Hanford	
MAILING ADDRESS: 321 North Clark Street, Suite 1100, Chicago, IL 60654	
E-MAIL ADDRESS: ehanford@littler.com	
OFFICE TELEPHONE NUMBER: 312-372-5520	
CELL PHONE NUMBER:	FAX:
s/ Elizabeth Hanford	
SIGNATURE: _____ (Please sign in ink.)	
DATE: May 31, 2022	

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**FIRST AMENDED CHARGE  
AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 13-CA-296145	Date Filed 6-02-2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer  Starbucks Corporation		b. Tel. No. (206) 318-2212
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code)  1174 E. 55 <sup>th</sup> St, Chicago, IL 60615	e. Employer Representative  Howard Schultz, CEO	g. e-mail hschultz@starbucks.com
		h. Number of workers employed 19
		i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop
j. Identify principal product or service Food and Beverage		

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Please see attached

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)


Workers United

4a. Address (Street and number, city, state, and ZIP code)  Workers United 22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.

Gabe Frumkin, Attorney

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Barnard Iglitzin & Lavitt LLP  
18 West Mercer St., Ste. 400

Address Seattle, WA 98119

Date 06/01/2022

Tel. No.  
(206) 257-6012

Office, if any, Cell No.

Fax No.  
(206) 378-4132e-mail  
frumkin@workerlaw.com**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## Attachment

### 2. Basis of the Charge

Within the last six months, the Employer has engaged in unlawful conduct that has a tendency to restrain employees in their exercise of their Section 7 rights by, among other things, doing the following:

1. Discriminating against an employee who is a known union supporter by issuing discipline in a discriminatory manner.
2. Making implied and actual threats against an employee.
3. Making implied threats by telling an employee that if they hate the Employer, then they should quit their employment for the Employer.
4. Interrogating an employee about union activity and/or soliciting grievances.
5. Impliedly promising a grant of benefit if the employee rejects unionization.
6. On and after approximately May 28, 2022, ordering employees to refrain from communicating about terms and conditions of their employment.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

June 2, 2022

Howard Schultz, CEO  
Starbucks Corporation  
1174 East 55th Street  
Chicago, IL 60615

Re: Starbucks Corporation  
Case 13-CA-296145

Dear Mr. Schultz:

Enclosed is a copy of the first amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Examiner Christopher J. Lee whose telephone number is (312)353-9777 and email address is [Christopher.Lee@nlrb.gov](mailto:Christopher.Lee@nlrb.gov). If the agent is not available, you may contact Supervisor Field Examiner Joyce A. Hofstra whose telephone number is (312)353-7609.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge by June 16, 2022. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlrb.gov](http://www.nlrb.gov)). You must e-file all documents electronically or provide a

written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a large, sweeping "T" and "W".

Timothy L. Watson  
Acting Regional Director

Enclosure: Copy of first amended charge

cc: Elizabeth Hanford  
321 N. Clark Street Suite 1100  
Chicago, IL 60654

Alice D. Kirkland, Esq.  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136

Noah G. Lipschultz, ESQ.  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

June 2, 2022

Workers United  
22 South 22nd St.  
Philadelphia, PA 19103-3005

Re: Starbucks Corporation  
Case 13-CA-296145

Dear Sir or Madam:

We have docketed the first amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Examiner Christopher J. Lee whose telephone number is (312)353-9777 and email address is [Christopher.Lee@nlrb.gov](mailto:Christopher.Lee@nlrb.gov). If the agent is not available, you may contact Supervisor Field Examiner Joyce A. Hofstra whose telephone number is (312)353-7609.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlr.gov](http://www.nlr.gov)). You must e-file all documents electronically or provide a



written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a large, stylized "T" and "W".

Timothy L. Watson  
Acting Regional Director

cc: Gabe Frumkin, Attorney  
Barnard Iglitzin & Lavitt LLP  
18 W Mercer St., Ste 400  
Seattle, WA 98119

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD**SECOND AMENDED CHARGE AGAINST EMPLOYER****INSTRUCTIONS:****DO NOT WRITE IN THIS SPACE**

Case

Date Filed

13-CA-296145

7/18/2022

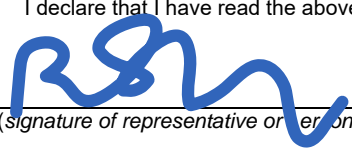
File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Tel. No. (206)318-2212
		c. Cell No.
d. Address (Street, city, state, and ZIP code) 1174 East 55th Street, Chicago, IL 60615	e. Employer Representative Howard Schultz CEO	f. Fax No.
		g. e-mail hschultz@starbucks.com
		h. Number of Workers Employees 19
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify Principal Product or Service Food and Beverage	
1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (4) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  SEE ATTACHMENT		

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

4a. Address (Street and number, city, state, and ZIP code) 22 South 22nd Street, Philadelphia, PA 19103		4b. Tel. No. (646)448-6414
		4c. Cell No.
		4d. Fax No. (215)575-9065
		4e. e-mail <a href="mailto:rminter@pjbwu.org">rminter@pjbwu.org</a>
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union		
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		Tel. No. (312)801/8848
		Office, if any, Cell No.
Robert S. Cervone (Print/type name and title or office, if any)		Fax No.
Date: 7/18/2022		e-mail rcervone@laboradvocates.com
(signature of representative or person making charge) 		
Address: 8 S. Michigan Ave., 1900, Chicago IL 60603		

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

Attachment to Charge 13-CA-296145

1. Around late-January of 2022, the Employer threatened to change employees' working conditions.
2. Around February 16, 2022, the Employer threatened to change work procedures.
3. Around early-May of 2022, the Employer made an implied threat of loss of benefits.
4. Around February 16, 2022 and early-May of 2022, the Employer held unlawful mandatory/captive audience meetings.
5. Around May 16, 2022, the Employer threatened employees with a reduction in pay; enforcement of stricter rules and discipline; and change in working conditions.
6. Around May 16, 2022, the Employer interfered with employees' ability to engage in protected, concerted activity and/or threatened employees with discharge by telling them to quit if they do not like working for the Employer.
7. Around May 28, 2022, the Employer interfered with employees' ability to engage in protected, concerted activity.
8. Around (b) (6), (b) (7)(C) 2022 and (b) (6), (b) (7)(C) 2022, the Employer disciplined employee (b) (6), (b) (7)(C) because (b) (6), (b) (7)(C) joined or supported the union and/or participated in Board processes.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Workers United/SEIU

and

Starbucks Corp.

CASE 13-CA-296145 et al.

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_

Charing Party

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Robert S Cervone

MAILING ADDRESS: 8 S Michigan Ave., 1900, Chicago 60603

E-MAIL ADDRESS: rcervone@laboradvocates.com

OFFICE TELEPHONE NUMBER: 312-801-8848

CELL PHONE NUMBER: \_\_\_\_\_ FAX: \_\_\_\_\_

SIGNATURE: Robert S Cervone

DATE: 7/11/22  
(Please sign in ink.)

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

July 18, 2022

Howard Schultz, CEO  
Starbucks Corporation  
1174 East 55th Street  
Chicago, IL 60615

Re: Starbucks Corporation  
Case 13-CA-296145

Dear Mr. Schultz:

Enclosed is a copy of the second amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Examiner Christopher J. Lee whose telephone number is (312)353-9777 and whose email address is [Christopher.Lee@nlrb.gov](mailto:Christopher.Lee@nlrb.gov). If the agent is not available, you may contact Supervisor Field Examiner Joyce A. Hofstra whose telephone number is (312)353-7609.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the second amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink, appearing to read "Angie C. Hamada", with a long horizontal flourish extending to the right.

Angie C. Hamada  
Regional Director

Enclosure: Copy of second amended charge

cc: Elizabeth Hanford  
321 N. Clark Street  
Suite 1100  
Chicago, IL 60654

Alice D. Kirkland, Esq.  
Littler Mendelson, P.C.  
80 South 8th Street,  
Suite 1300  
Minneapolis, MN 55402-2136

Noah G. Lipschultz, ESQ.  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

July 18, 2022

Chicago and Midwest Regional Joint Board, Workers United/SEIU  
22 South 22nd Street  
Philadelphia, PA 19103

Re: Starbucks Corporation  
Case 13-CA-296145

Dear Sir or Madam:

We have docketed the second amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Examiner Christopher J. Lee whose telephone number is (312)353-9777 and whose email address is [Christopher.Lee@nlrb.gov](mailto:Christopher.Lee@nlrb.gov). If the agent is not available, you may contact Supervisor Field Examiner Joyce A. Hofstra whose telephone number is (312)353-7609.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the second amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

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Very truly yours,

A handwritten signature in black ink, appearing to read "Angie C. Hamada", with a long horizontal flourish extending to the right.

Angie C. Hamada  
Regional Director

cc: Gabe Frumkin, Attorney  
Barnard Iglitzin & Lavitt LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119

Robert S. Cervone, ESQ.  
Dowd, Bloch, Bennett, Cervone,  
Auerbach & Yokich LLP  
8 South Michigan Avenue  
19th Floor  
Chicago, IL 60603-3315



**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 13**

**STARBUCKS CORPORATION**

**and**

**Case 13-CA-296145**

**WORKERS UNITED AFFILIATED  
WITH THE SERVICE EMPLOYEES  
INTERNATIONAL UNION (SEIU)**

**COMPLAINT AND NOTICE OF HEARING**

This Complaint and Notice of Hearing is based on a charge filed by Workers United Affiliated with the Service Employees International Union (SEIU) (Charging Party). It is issued pursuant to Section 10(b) of the National Labor Relations Act (the Act), 29 U.S.C. § 151 et seq., and Section 102.15 of the Rules and Regulations of the National Labor Relations Board (the Board) and alleges that Starbucks Corporation (Respondent) has violated the Act as described below.

**I**

(a) The charge in this proceeding was filed by the Charging Party on May 20, 2022, and a copy was served on Respondent by U.S. mail on May 20, 2022.

(b) The first amended charge in this proceeding was filed by the Charging Party on June 2, 2022, and a copy was served on Respondent by U.S. mail on June 2, 2022.

(c) The second amended charge in this proceeding was filed by the Charging Party on July 18, 2022, and a copy was served on Respondent by U.S. mail on July 18, 2022.

**II**

(a) At all material times, Respondent has been a Washington corporation with headquarters in Seattle, Washington, and facilities located throughout the United States, including a facility located at 1174 East 55<sup>th</sup> Street, Chicago, Illinois 60615 ("Respondent's facility") and has been engaged in retail sale of food and beverages.

(b) During the preceding twelve months, a representative period, Respondent, in conducting its business operations as described above in paragraph II (a), derived gross revenues in excess of \$500,000 and purchased and received goods valued in excess of \$5,000 directly from points outside the State of Illinois.

(c) At all material times, Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6) and (7) of the Act.

### III

At all material times, the Charging Party has been a labor organization within the meaning of Section 2(5) of the Act.

### IV

At all material times, the following individuals held the position set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the act and agents of Respondent within the meaning of Section 2(13) of the Act:

(b) (6), (b) (7)(C)  
(b) (6), (b) (7)(C)

### V

(a) About late-January of 2022, Respondent, by (b) (6), (b) (7)(C) at the Respondent's facility, threatened to change employees' working conditions.

(b) About February 16, 2022, and early-May of 2022, at Respondent's facility, Respondent held individual mandatory meetings for its employees during their working time to listen to Respondent's unsolicited views on union activity and/or union activity.

(c) About February 16, 2022, Respondent, by (b) (6), (b) (7)(C), at a mandatory meeting described above in paragraph V(b), threatened to change the Respondent's work procedures.

(d) About early May 2022, Respondent, by (b) (6), (b) (7)(C) at a mandatory meeting described above in paragraph V(b), at the Respondent's facility, impliedly threatened employees with loss of benefits.

(e) About May 16, 2022, Respondent, by (b) (6), (b) (7)(C) at the Respondent's facility:

- (i) Threatened employees with a reduction in pay;
- (ii) Threatened employees with stricter enforcement of rules and regulations and;
- (iii) Threatened to change employees' working conditions.

(f) About May 28, 2022, Respondent, by (b) (6), (b) (7)(C), interfered with employees protected, concerted activities by telling them not to discuss possible exposure to COVID.

## VI

(a) On (b) (6), (b) (7)(C) 2022, Respondent issued a written warning to employee (b) (6), (b) (7)(C).

(b) On (b) (6), (b) (7)(C) 2022, Respondent issued a final written warning to employee (b) (6), (b) (7)(C).

(c) Respondent engaged in the conduct described above in paragraphs VI(a) and (b) because the named employee of Respondent gave testimony to the Board at a representation hearing.

## VII

(a) By the conduct described above in paragraph V, Respondent has been interfering with, restraining and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1) of the Act.

(b) By the conduct described above in paragraph VI(a) and (b), Respondent has been discriminating against employees for filing charges or giving testimony under the Act in violation of Section 8(a)(1) and (4) of the Act.

(c) The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

## REMEDY

WHEREFORE, as part of the remedy for the unfair labor practices allege above in paragraphs IV and V, the General Counsel seeks an Order requiring Respondent to hold a meeting or meetings with Respondent's employees, scheduled to ensure the widest possible attendance on each shift, at which a responsible management official of the Respondent will read the Notice in English to employees on work time in the presence of a Board Agent and one representative from the Charging Party Union. The General Counsel further seeks all relief as may be just and proper to remedy the unfair labor practices alleged.

### **ANSWER REQUIREMENT**

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before August 12, 2022, or postmarked on or before August 11, 2022.** Respondent also must serve a copy of the answer on each of the other parties.

The answer must be filed electronically through the Agency's website. To file electronically, go to [www.nlrb.gov](http://www.nlrb.gov), click on **E-File Documents**, enter the NLRB Case Number, and follow the

detailed instructions. Responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

#### **NOTICE OF HEARING**

PLEASE TAKE NOTICE THAT on **October 31, 2022 at 10:00 a.m., at The Dirksen Federal Building, 219 South Dearborn Street, Suite 808, Chicago, IL or Via Zoom Videoconference**, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated this 29th day of July 2022.

**/s/Angie Cowan Hamada**

---

Angie Cowan Hamada  
REGIONAL DIRECTOR  
NATIONAL LABOR RELATIONS BOARD  
REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Attachments

UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
**NOTICE**

Case 13-CA-296145

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

Howard Schultz, CEO  
Starbucks Corporation  
1174 East 55th Street  
Chicago, IL 60615  
[hschultz@starbucks.com](mailto:hschultz@starbucks.com)

Elizabeth Hanford  
321 N. Clark Street, Suite 1100  
Chicago, IL 60654  
[ehanford@littler.com](mailto:ehanford@littler.com)

Alice D. Kirkland, Esq.  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136  
[akirkland@littler.com](mailto:akirkland@littler.com);  
[starbucksnlrb@littler.com](mailto:starbucksnlrb@littler.com)

Noah G. Lipschultz , Attorney  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136  
Noah G. Lipschultz, Attorney

Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136  
[nlipschultz@littler.com](mailto:nlipschultz@littler.com)

Gabe Frumkin, Attorney  
Barnard Iglitzin & Lavitt LLP  
18 W Mercer St., Suite. 400  
Seattle, WA 98119  
[frumkin@workerlaw.com](mailto:frumkin@workerlaw.com)

Robert S. Cervone, ESQ.  
Dowd, Bloch, Bennett, Cervone, Auerbach &  
Yokich LLP  
8 South Michigan Avenue, 19th Floor  
Chicago, IL 60603-3315  
[rcervone@laboradvocates.com](mailto:rcervone@laboradvocates.com)

Workers United a/w SEIU  
22 South 22nd Street, Level M  
Philadelphia, PA 19103

## Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: [www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules\\_and\\_regs\\_part\\_102.pdf](http://www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf).

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at [www.nlr.gov](http://www.nlr.gov), click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

**Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement.** The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

### I. BEFORE THE HEARING

The rules pertaining to the Board's pre-hearing procedures, including rules concerning filing an answer, requesting a postponement, filing other motions, and obtaining subpoenas to compel the attendance of witnesses and production of documents from other parties, may be found at Sections 102.20 through 102.32 of the Board's Rules and Regulations. In addition, you should be aware of the following:

- **Special Needs:** If you or any of the witnesses you wish to have testify at the hearing have special needs and require auxiliary aids to participate in the hearing, you should notify the Regional Director as soon as possible and request the necessary assistance. Assistance will be provided to persons who have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603.
- **Pre-hearing Conference:** One or more weeks before the hearing, the ALJ may conduct a telephonic prehearing conference with the parties. During the conference, the ALJ will explore whether the case may be settled, discuss the issues to be litigated and any logistical issues related to the hearing, and attempt to resolve or narrow outstanding issues, such as disputes relating to subpoenaed witnesses and documents. This conference is usually not recorded, but during the hearing the ALJ or the parties sometimes refer to discussions at the pre-hearing conference. You do not have to wait until the prehearing conference to meet with the other parties to discuss settling this case or any other issues.

### II. DURING THE HEARING

The rules pertaining to the Board's hearing procedures are found at Sections 102.34 through 102.43 of the Board's Rules and Regulations. Please note in particular the following:

- **Witnesses and Evidence:** At the hearing, you will have the right to call, examine, and cross-examine witnesses and to introduce into the record documents and other evidence.
- **Exhibits:** Each exhibit offered in evidence must be provided in duplicate to the court reporter and a copy of each of each exhibit should be supplied to the ALJ and each party when the exhibit is offered

**in evidence.** If a copy of any exhibit is not available when the original is received, it will be the responsibility of the party offering such exhibit to submit the copy to the ALJ before the close of hearing. If a copy is not submitted, and the filing has not been waived by the ALJ, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

- **Transcripts:** An official court reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the ALJ for approval. Everything said at the hearing while the hearing is in session will be recorded by the official reporter unless the ALJ specifically directs off-the-record discussion. If any party wishes to make off-the-record statements, a request to go off the record should be directed to the ALJ.
- **Oral Argument:** You are entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. Alternatively, the ALJ may ask for oral argument if, at the close of the hearing, if it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.
- **Date for Filing Post-Hearing Brief:** Before the hearing closes, you may request to file a written brief or proposed findings and conclusions, or both, with the ALJ. The ALJ has the discretion to grant this request and to will set a deadline for filing, up to 35 days.

### III. AFTER THE HEARING

The Rules pertaining to filing post-hearing briefs and the procedures after the ALJ issues a decision are found at Sections 102.42 through 102.48 of the Board's Rules and Regulations. Please note in particular the following:

- **Extension of Time for Filing Brief with the ALJ:** If you need an extension of time to file a post-hearing brief, you must follow Section 102.42 of the Board's Rules and Regulations, which requires you to file a request with the appropriate chief or associate chief administrative law judge, depending on where the trial occurred. You must immediately serve a copy of any request for an extension of time on all other parties and furnish proof of that service with your request. You are encouraged to seek the agreement of the other parties and state their positions in your request.
- **ALJ's Decision:** In due course, the ALJ will prepare and file with the Board a decision in this matter. Upon receipt of this decision, the Board will enter an order transferring the case to the Board and specifying when exceptions are due to the ALJ's decision. The Board will serve copies of that order and the ALJ's decision on all parties.
- **Exceptions to the ALJ's Decision:** The procedure to be followed with respect to appealing all or any part of the ALJ's decision (by filing exceptions with the Board), submitting briefs, requests for oral argument before the Board, and related matters is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be provided to the parties with the order transferring the matter to the Board.



**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 13**

STARBUCKS CORPORATION

Respondent

Case No. 13-CA-29145

and

WORKERS UNITED AFFILIATED WITH THE  
SERVICE EMPLOYEES INTERNATIONAL UNION  
(SEIU)

Charging Party

**RESPONDENT'S ANSWER TO COMPLAINT AND NOTICE OF HEARING**

Respondent Starbucks Corporation ("Respondent") hereby files this Answer to the Regional Director's Complaint and Notice of Hearing ("Complaint"), as follows:

I.

(a) The charge in this proceeding was filed by the Charging Party on May 20, 2022, and a copy was served on Respondent by U.S. mail on May 20, 2022.

(b) The first amended charge in this proceeding was filed by the Charging Party on June 2, 2022, and a copy was served on Respondent by U.S. mail on June 2, 2022.

(c) The second amended charge in this proceeding was filed by the Charging Party on July 18, 2022, and a copy was served on Respondent by U.S. mail on July 18, 2022.

**Answer: Based on information and belief, Respondent admits the allegations set forth in Paragraph I of the Complaint.**

II.

(a) At all material times, Respondent has been a Washington corporation with headquarters in Seattle, Washington, and facilities located throughout the United States, including a facility located at 1174 East 55<sup>th</sup> Street, Chicago, Illinois 60615 ("Respondent's facility") and has been engaged in retail sale of food and beverages.

(b) During the preceding twelve months, a representative period, Respondent, in conducting its business operations as described above in paragraph II (a), derived gross revenues in excess of \$500,000 and purchased and received goods valued in excess of \$5,000 directly from points outside the State of Illinois.

(c) At all material times, Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6) and (7) of the Act.

**Answer: Respondent admits the allegations set forth in Paragraph II(a)-(c) of the Complaint.**

### III.

At all material times, the Charging Party has been a labor organization within the meaning of Section 2(5) of the Act.

**Answer: Based on information and belief, Respondent admits the allegations set forth in Paragraph III of the Complaint.**

### IV.

At all material times, the following individuals held the position set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the act and agents of Respondent within the meaning of Section 2(13) of the Act:

(b) (6), (b) (7)(C)  
(b) (6), (b) (7)(C)

**Answer: Respondent denies that the allegations in Paragraph IV apply “at all material times” because that phrase is not defined or limited in the Complaint. With this limitation, Respondent admits that (b) (6), (b) (7)(C) is (b) (6), (b) (7)(C) for Respondent and (b) (6), (b) (7)(C) is (b) (6), (b) (7)(C) for Respondent. Respondent admits that both (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) are supervisors within the meaning of Section 2(11) of the Act and are agents of Respondent within the meaning of Section 2(13) of the Act.**

V.

(a) About late-January of 2022, Respondent, by (b) (6), (b) (7)(C) at the Respondent's facility, threatened to change employees' working conditions.

**Answer:** Respondent denies the allegations in Paragraph V(a) of the Complaint.

(b) About February 16, 2022, and early-May of 2022, at Respondent's facility, Respondent held individual mandatory meetings for its employees during their working time to listen to Respondent's unsolicited views on union activity and/or union activity.

**Answer:** Respondent denies the allegations in Paragraph V(b) of the Complaint.

(c) About February 16, 2022, Respondent, by (b) (6), (b) (7)(C), at a mandatory meeting described above in paragraph V(b), threatened to change the Respondent's work procedures.

**Answer:** Respondent denies the allegations in Paragraph V(c) of the Complaint.

(d) About early May 2022, Respondent, by (b) (6), (b) (7)(C) at a mandatory meeting described above in paragraph V(b), at the Respondent's facility, impliedly threatened employees with loss of benefits.

**Answer:** Respondent denies the allegations in Paragraph V(d) of the Complaint.

(e) About May 16, 2022, Respondent, by (b) (6), (b) (7)(C) at the Respondent's facility:

- (i) Threatened employees with a reduction in pay;
  - (ii) Threatened employees with stricter enforcement of rules and regulations
- and;
- (iii) Threatened to change employees' working conditions.

**Answer:** Respondent denies the allegations in Paragraph V(e) of the Complaint.

(f) About May 28, 2022, Respondent, by (b) (6), (b) (7)(C), interfered with employees protected, concerted activities by telling them not to discuss possible exposure to COVID.

**Answer:** Respondent denies the allegations in Paragraph V(f) of the Complaint.

VI.

(a) On (b) (6), (b) (7)(C) 2022, Respondent issued a written warning to employee (b) (6), (b) (7)(C).

**Answer:** Respondent admits the allegations in Paragraph IV(a) of the Complaint.

(b) On (b) (6), (b) (7)(C) 2022, Respondent issued a final written warning to employee (b) (6), (b) (7)(C).

**Answer:** Respondent admits the allegations in Paragraph IV(b) of the Complaint.

(c) Respondent engaged in the conduct described above in paragraphs VI (a) and (b) because the named employee of Respondent gave testimony to the Board at a representation hearing.

**Answer:** Respondent denies the allegations in paragraph VI (c) of the Complaint.

VII.

(a) By the conduct described above in paragraph V, Respondent has been interfering with, restraining and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1) of the Act.

(b) By the conduct described above in paragraph VI(a) and (b), Respondent has been discriminating against employees for filing charges or giving testimony under the Act in violation of Section 8(a)(1) and (4) of the Act.

(c) The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

**Answer:** Respondent denies the allegations in Paragraph VII(a)-(c) of the Complaint.

REMEDY

WHEREFORE, as part of the remedy for the unfair labor practices allege above in paragraphs IV and V, the General Counsel seeks an Order requiring Respondent to hold a meeting or meetings with Respondent's employees, scheduled to ensure the widest possible attendance on each shift, at which a responsible management official of the Respondent will read the Notice in

English to employees on work time in the presence of a Board Agent and one representative from the Charging Party Union. The General Counsel further seeks all relief as may be just and proper to remedy the unfair labor practices alleged.

**Answer: Respondent denies the allegations in the REMEDY paragraph of the Complaint. Respondent further denies that it violated the Act and denies that any relief is appropriate.**

### **AFFIRMATIVE AND OTHER DEFENSES**

1. The allegations in the Complaint fail to state a claim upon which relief may be granted.
2. The allegations in the Complaint are impermissibly vague and ambiguous and a denial of due process.
3. The allegations in the Complaint, and the charges underlying the Complaint, were filed and made in bad faith, and for vexatious and improper purposes, including to infringe upon Respondent's rights and the operation of its business.
4. To the extent that the Complaint contains allegations that are beyond the scope of the charge(s), such allegations are barred.
5. The determination to issue the Complaint was made without affording Respondent a fair and equal opportunity to present evidence responding to the Charging Party's claims, and as a result without such evidence, thus depriving Respondent of the due process to which it is entitled.
6. Respondent has acted at all times in good faith and in compliance with the Act and pursuant to its well-established rules and practices.
7. Respondent acted at all times in accordance with its lawful property and managerial rights.

8. The purported violations of Section 8(a)(1) alleged in the Complaint are barred to the extent that they conflict with, are contrary to, and precluded by the free speech rights Respondent has under Section 8(c) of the Act.

9. The purported violations of Sections 8(a)(1) alleged in the Complaint are barred to the extent that they conflict with, are contrary to, and precluded by Section 10(c) of the Act.

10. None of the alleged violations of the Act are predicated upon conduct that could be found to have interfered with, restrained, or coerced any employees in the exercise of rights guaranteed in Section 7 of the Act.

11. The National Labor Relations Board is not empowered to substitute its judgment for Respondent's lawful employment decisions.

12. Assuming, arguendo, any Complaint allegation is found to be a violation of the Act, a retroactive remedy would be a manifest injustice and denial of due process.

13. Any statement made by any of Respondent's supervisor's and/or agents fall within the ambit of Section 8(c) of the Act, and as such, neither constitutes nor can be used as evidence of an unfair labor practice.

14. The conduct alleged in the Complaint had a de minimis impact, if any, on rights guaranteed by Section 7 of the Act and thus no remedy exists that would further the purposes of the Act.

15. The allegations in the Complaint are contrary to, precluded by, and violate the First Amendment rights of Respondent.

16. The General counsel lacks the proper authority to issue and litigate the Complaint.

17. Insofar as this case comes before the Board, Members Gwynne Wilcox and David Prouty should recuse themselves based on their past, present, and perceived relationship with the

Service Employees (“SEIU”) International and Local Unions, and their affiliates, including the Charging Party Workers United.

18. The National Labor Relations Act, as interpreted and/or applied, violates the Respondent’s rights under the U.S. Constitution.

19. The allegations in the Complaint are directly contrary to long-settled Board law, violate Respondent’s Constitutional rights, and have a clear chilling effect on Respondent’s constitutional and statutory rights to communicate with its partners about unions including without limitation their right to refrain from supporting any union.

20. Respondent reserves the right to amend, modify, revise and plead further any additional defenses, affirmative or otherwise, during the course of these proceedings.

**WHEREFORE**, Respondent Starbucks Corporation prays that an Order dismissing the Complaint in its entirety with prejudice, be entered and that Respondent have such other and further relief to which it may be entitled.

Respectfully submitted,

/s/ Alice D. Kirkland

Noah G. Lipschultz (MN Bar No. 0387308)

[nlipschultz@littler.com](mailto:nlipschultz@littler.com)

Alice D. Kirkland (MN Bar No. 0396554)

[akirkland@littler.com](mailto:akirkland@littler.com)

LITTLER MENDELSON, P.C.

1300 IDS Center, 80 S. 8<sup>th</sup> Street

Minneapolis, MN 55402

Telephone: (612) 313-7629

Facsimile: (651) 389-9135

Elizabeth Hanford, (Bar No. 6324009)  
[ehanford@littler.com](mailto:ehanford@littler.com)  
LITTLER MENDELSON, P.C.  
321 North Clark Street, Suite 1100  
Chicago, IL 60654  
Telephone: 312.372.5520

*Attorneys for Respondent Starbucks  
Corporation*

Dated: August 12, 2022



### **CERTIFICATE OF SERVICE**

I hereby certify that, on this 12th day of August, 2022, the foregoing *Respondent's Answer to Complaint and Notice of Hearing* in Case No. 13-CA-296145 was filed with the Regional Director for Region 13 via the Agency's E-Filing System, and that a copy of the foregoing was served upon the following parties via electronic mail:

Gabe Frumkin  
Barnard Iglitzin & Lavitt LLP  
18 West Mercer St., Ste. 400  
Seattle, WA 98119  
[frumkin@workerlaw.com](mailto:frumkin@workerlaw.com)

Robert S. Cervone  
Dowd, Bloch, Bennett, Cervone, Auerbach & Yokich LLP  
8 South Michigan Avenue, 19th Floor  
Chicago, IL 60603-3315  
[rcervone@laboradvocates.com](mailto:rcervone@laboradvocates.com)

Angie Cowan Hamada, Regional Director  
NATIONAL LABOR RELATIONS BOARD  
Region 13  
[Angie.hamada@nlrb.gov](mailto:Angie.hamada@nlrb.gov)

/s/ Alice D. Kirkland  
An Attorney for Respondent

4877-4098-6668.1 / 055187-1198

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE

Case  
13-CA-296221Date Filed  
5/20/2022**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer  Starbucks Corporation		b. Tel. No. (206) 318-2212
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code)  2543 N California Ave, Chicago, IL 60647	e. Employer Representative  Howard Schultz, CEO	g. e-mail hschultz@starbucks.com
		h. Number of workers employed Approx. 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the last six months, the Employer has violated the Act by, among other things, engaging in surveillance of known union supporters and more strictly enforcing its dress code as a form of retaliation against employees who support unionization.

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)

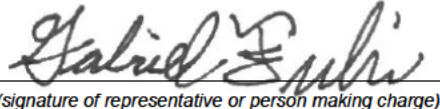
Workers United

4a. Address (Street and number, city, state, and ZIP code)  Workers United 22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.  
(signature of representative or person making charge)Gabe Frumkin, Attorney  
(Print/type name and title or office, if any)Barnard Iglitzin & Lavitt LLP  
18 West Mercer St., Ste. 400  
Address Seattle, WA 98119

Date 05/20/2022

Tel. No. (206) 257-6012
Office, if any, Cell No.
Fax No. (206) 378-4132
e-mail frumkin@workerlaw.com

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

May 23, 2022

Philadelphia Joint Board, Workers United  
22 South 22nd Street  
Philadelphia, PA 19103

Re: Starbucks Corporation  
Case 13-CA-296221

Dear Sir or Madam:

The charge that you filed in this case on May 20, 2022 has been docketed as case number 13-CA-296221. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and whose e-mail address is [sylvia.posey@nlrb.gov](mailto:sylvia.posey@nlrb.gov). If this Board agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to

take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

May 23, 2022

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a long horizontal stroke at the end.

TIMOTHY L. WATSON  
Regional Director

cc: Gabe Frumkin, Attorney  
Barnard Iglitzin & Lavitt LLP  
18 W Mercer St., Ste 400  
Seattle, WA 98119



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
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Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

May 23, 2022

Howard Schultz  
2543 N California Ave  
Chicago, IL 60647

Re: Starbucks Corporation  
Case 13-CA-296221

Dear Mr. Schultz:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and whose e-mail address is [sylvia.posey@nlrb.gov](mailto:sylvia.posey@nlrb.gov). If this Board agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

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If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge by June 3, 2022. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not

enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlrb.gov](http://www.nlrb.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a large initial "T" and "W".

TIMOTHY L. WATSON  
Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



# NATIONAL LABOR RELATIONS BOARD NOTICE OF APPEARANCE

STARBUCKS CORPORATION,  <div style="text-align: right;">Employer,</div>	CASE NO.: 13-CA-296221
and	
CHICAGO & MIDWEST REGIONAL JOINT BOARD, WORKERS UNITED/SEIU,  <div style="text-align: right;">Union.</div>	

TO: (Check One Box Only)<sup>1</sup>

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> REGIONAL DIRECTOR<br>NATIONAL LABOR RELATIONS BOARD<br>Region 13<br>219 South Dearborn Street<br>Suite 808<br>Chicago, IL 60604-2027 | <input type="checkbox"/> EXECUTIVE SECRETARY<br>NATIONAL LABOR RELATIONS BOARD | <input type="checkbox"/> GENERAL COUNSEL<br>NATIONAL LABOR RELATIONS BOARD |
|--|--|--|

**THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF**

Starbucks Corporation

**CHECK THE APPROPRIATE BOX(ES) BELOW:**

- ☒ REPRESENTATIVE IS AN ATTORNEY
- ☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASE HANDLING MANUAL.

*(REPRESENTATIVE INFORMATION)*

NAME Noah G. Lipschultz Esq.; Alice D. Kirkland, Esq.; Elizabeth Hanford, Esq.

MAILING ADDRESS Littler Mendelson, P.C., 80 South 8th Street, Suite 1300, Minneapolis, MN 55402;  
321 North Clark Street, Suite 1100, Chicago, IL 60654

E-MAIL ADDRESS [nlipschultz@littler.com](mailto:nlipschultz@littler.com); [akirkland@littler.com](mailto:akirkland@littler.com); [ehanford@littler.com](mailto:ehanford@littler.com);  
[starbucksnlrb@littler.com](mailto:starbucksnlrb@littler.com)

OFFICE TELEPHONE NUMBER 612.313.7629; 612.313.7623; 312.795.3248

CELL PHONE NUMBER 773.750.8683; 612.801.5596; 708.490.8607 FAX 651.389.9135; 612.677.3205

SIGNATURE s/Alice D. Kirkland  
*(Please sign in ink)*

DATE June 7, 2022

4892-9154-0260.1 / 055187-1198

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
First Amended **CHARGE AGAINST EMPLOYER**

## DO NOT WRITE IN THIS SPACE

Case  
13-CA-296221Date Filed  
7/20/2022

## INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer  Starbucks Corporation		b. Tel. No. (206) 318-2212
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code)  2543 N California Ave, Chicago, IL 60647	e. Employer Representative  Howard Schultz, CEO	g. e-mail hschultz@starbucks.com
		h. Number of workers employed Approx. 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the last six months, the Employer has violated the Act by more strictly enforcing its dress code as a form of retaliation against employees who support unionization.

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

4a. Address (Street and number, city, state, and ZIP code)  Workers United 22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union

## 6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.



(signature of representative or person making charge)

Robert S Cervone

(Print/type name and title or office, if any)

8 S Michigan Ave., 1900, Chicago 60603

Date 7/20/22

Tel. No.  312-801-8848
Office, if any, Cell No.
Fax No.
e-mail rcervone@laboradvocates.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

July 22, 2022

Philadelphia Joint Board, Workers United  
121 S. Broad Street, Suite 1300  
Philadelphia, PA 19103

Re: Starbucks Corporation  
Case 13-CA-296221

Dear Sir or Madam:

We have docketed the first amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and whose email address is [Sylvia.Posey@nlrb.gov](mailto:Sylvia.Posey@nlrb.gov). If the agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlrb.gov](http://www.nlrb.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to

comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink, appearing to read "Angie C. Hamada", with a long horizontal flourish extending to the right.

Angie C. Hamada  
Regional Director

cc: Robert S. Cervone, Attorney  
Dowd Bloch Bennet Cervone Auerbach &  
Yokich LLP  
8 South Michigan Avenue, Suite 1900  
Chicago, IL 60603-3315



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

July 22, 2022

Howard Schultz  
2543 N California Ave  
Chicago, IL 60647

Re: Starbucks Corporation  
Case 13-CA-296221

Dear Mr. Schultz:

Enclosed is a copy of the first amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and whose email address is [Sylvia.Posey@nlrb.gov](mailto:Sylvia.Posey@nlrb.gov). If the agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

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determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink, appearing to read "Angie C. Hamada", with a long horizontal flourish extending to the right.

Angie C. Hamada  
Regional Director

Enclosure: Copy of first amended charge

cc: Noah G. Lipschultz, Attorney  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136

Alice D. Kirkland, Esq.  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136

Elizabeth Hanford, ESQ.  
Littler Mendelson, P.C.  
321 North Clark Street, Suite 1100  
Chicago, IL 60654-4715

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 13**

**STARBUCKS CORPORATION**

**and**

**Cases 13-CA-296221  
13-CA-296225**

**WORKERS UNITED AFFILIATED  
WITH THE SERVICE EMPLOYEES  
INTERNATIONAL UNION (SEIU)**

**ORDER CONSOLIDATING CASES, CONSOLIDATED  
COMPLAINT AND NOTICE OF HEARING**

Pursuant to Section 102.33 of the Rules and Regulations of the National Labor Relations Board (the Board) and to avoid unnecessary costs or delay, IT IS ORDERED THAT Case 13-CA-296221 and Case 13-CA-296225, which are based on charges filed by Workers United affiliated with Service Employees International Union (Charging Party), against Starbucks Corporation (Respondent) are consolidated.

This Order Consolidating Cases, Consolidated Complaint and Notice of Hearing, which is based on these charges, is issued pursuant to Section 10(b) of the National Labor Relations Act, 29 U.S.C. § 151 et seq. (the Act) and Section 102.15 of the Board's Rules and Regulations, and alleges Respondent has violated the Act as described below:

**I**

(a) The charge in case 13-CA-296221 was filed by the Charging Party on May 20, 2022, and a copy was served on Respondent by U.S. mail on May 23, 2022.

(b) The first amended charge in case 13-CA-296221 was filed by the Charging Party on July 20, 2022, and a copy was served on Respondent by U.S. mail on July 22, 2022.

(c) The charge in case 13-CA-296225 was filed by the Charging Party on May 20, 2022, and a copy was served on Respondent by U.S. mail on May 23, 2022.

(d) The first amended charge in case 13-CA-296225 was filed by the Charging Party on July 20, 2022, and a copy was served on Respondent by U.S. mail on July 22, 2022.

## II

(a) At all material times, Respondent has been a Washington corporation with headquarters in Seattle, Washington, and facilities located throughout the United States, including facilities located at 2543 N. California Ave., Chicago, IL (Respondent's 2543 N. California facility) and 1070 W. Bryn Mawr Ave., Chicago, IL (Respondent's 1070 W. Bryn Mawr facility), and has been engaged in retail sale of food and beverages.

(b) During the preceding twelve months, a representative period, Respondent, in conducting its business operations as described above in paragraph II (a), derived gross revenues in excess of \$500,000 and purchased and received goods valued in excess of \$5,000 directly from points outside the State of Illinois.

(c) At all material times, Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6) and (7) of the Act.

## III

At all material times, the Charging Party has been a labor organization within the meaning of Section 2(5) of the Act.

## IV

At all material times, the following individuals held the position set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the act and agents of Respondent within the meaning of Section 2(13) of the Act:

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

## V

(a) About February 2022, Respondent, by (b) (6), (b) (7)(C), at Respondent's 2543 N. California facility, interfered with employees Section 7 rights by informing employees that they are not allowed to wear items including but not limited to facial masks in support of the Union.

(b) About April 26, 2022, Respondent, by (b) (6), (b) (7)(C), at Respondent's 2543 N. California facility, interfered with employees Section 7 rights by informing employees that they are not allowed to wear items including but not limited to t-shirts in support of the Union.



(c) About May 10, 2022, Respondent, by (b) (6), (b) (7)(C) at Respondent's 1070 W. Bryn Mawr facility:

- (i) Threatened employees with loss of benefits for engaging in union and/or protected concerted activities;
- (ii) Threatened employees with loss of a wage increase for engaging in union and/or protected concerted activities;
- (iii) Interrogated employees about their union membership, activities, and sympathies;
- (iv) Informed employees that it would be futile for them to select the Charging Party as their bargaining representative.

## VI

By the conduct described above in paragraph V, Respondent has been interfering with, restraining and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1) of the Act.

## REMEDY

**WHEREFORE**, as part of the remedy for the unfair labor practices alleged above in paragraph V, the General Counsel seeks an Order requiring Respondent to hold a meeting or meetings with Respondent's employees, scheduled to ensure the widest possible attendance on each shift, at which a responsible management official of the Respondent will read the Notice in English to employees on work time in the presence of a Board Agent and one representative from the Charging Party Union. The General Counsel further seeks all relief as may be just and proper to remedy the unfair labor practices alleged.

## **ANSWER REQUIREMENT**

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the consolidated complaint. The answer must be **received by this office on or before August 30, 2022 , unless that date is a holiday], or postmarked on or before August 29, 2022.** Respondent also must serve a copy of the answer on each of the other parties.

The answer must be filed electronically through the Agency's website. To file electronically, go to [www.nlr.gov](http://www.nlr.gov), click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. Responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that

the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

### **NOTICE OF HEARING**

**PLEASE TAKE NOTICE THAT on November 15, 2022, 10:00 a.m. at The Dirksen Federal Building, 219 South Dearborn Street, Suite 808, Chicago, IL 60604 or via Zoom Video Conference**, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this consolidated complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated at Chicago, Illinois this 16<sup>th</sup> day of August 2022.

/s/ Angie Cowan Hamada

Angie Cowan Hamada  
Regional Director  
National Labor Relations Board  
Region 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

**Attachments**

UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
**NOTICE**

Cases 13-CA-296221, 13-CA-296225

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

Howard Schultz  
2543 N California Ave  
Chicago, IL 60647  
[hschultz@starbucks.com](mailto:hschultz@starbucks.com)

Noah G. Lipschultz , Attorney  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136  
[nlipschultz@littler.com](mailto:nlipschultz@littler.com)  
[starbucksnlrb@littler.com](mailto:starbucksnlrb@littler.com)

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[starbucksnlrb@littler.com](mailto:starbucksnlrb@littler.com)

Robert S. Cervone , Attorney  
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& Yokich LLP  
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Chicago, IL 60603  
[rcervone@laboradvocates.com](mailto:rcervone@laboradvocates.com)

Philadelphia Joint Board, Workers United  
121 S. Broad Street, Suite 1300  
Philadelphia, PA 19103

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Noah G. Lipschultz, Attorney  
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1300 IDS Center  
80 S 8th St  
Minneapolis, MN 55402-2136  
[nlipschultz@littler.com](mailto:nlipschultz@littler.com)  
[starbucksnlrb@littler.com](mailto:starbucksnlrb@littler.com)

## Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: [www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules\\_and\\_regs\\_part\\_102.pdf](http://www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf).

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at [www.nlr.gov](http://www.nlr.gov), click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

**Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement.** The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

### I. BEFORE THE HEARING

The rules pertaining to the Board's pre-hearing procedures, including rules concerning filing an answer, requesting a postponement, filing other motions, and obtaining subpoenas to compel the attendance of witnesses and production of documents from other parties, may be found at Sections 102.20 through 102.32 of the Board's Rules and Regulations. In addition, you should be aware of the following:

- **Special Needs:** If you or any of the witnesses you wish to have testify at the hearing have special needs and require auxiliary aids to participate in the hearing, you should notify the Regional Director as soon as possible and request the necessary assistance. Assistance will be provided to persons who have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603.
- **Pre-hearing Conference:** One or more weeks before the hearing, the ALJ may conduct a telephonic prehearing conference with the parties. During the conference, the ALJ will explore whether the case may be settled, discuss the issues to be litigated and any logistical issues related to the hearing, and attempt to resolve or narrow outstanding issues, such as disputes relating to subpoenaed witnesses and documents. This conference is usually not recorded, but during the hearing the ALJ or the parties sometimes refer to discussions at the pre-hearing conference. You do not have to wait until the prehearing conference to meet with the other parties to discuss settling this case or any other issues.

### II. DURING THE HEARING

The rules pertaining to the Board's hearing procedures are found at Sections 102.34 through 102.43 of the Board's Rules and Regulations. Please note in particular the following:

- **Witnesses and Evidence:** At the hearing, you will have the right to call, examine, and cross-examine witnesses and to introduce into the record documents and other evidence.
- **Exhibits:** Each exhibit offered in evidence must be provided in duplicate to the court reporter and a copy of each of each exhibit should be supplied to the ALJ and each party when the exhibit is offered

**in evidence.** If a copy of any exhibit is not available when the original is received, it will be the responsibility of the party offering such exhibit to submit the copy to the ALJ before the close of hearing. If a copy is not submitted, and the filing has not been waived by the ALJ, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

- **Transcripts:** An official court reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the ALJ for approval. Everything said at the hearing while the hearing is in session will be recorded by the official reporter unless the ALJ specifically directs off-the-record discussion. If any party wishes to make off-the-record statements, a request to go off the record should be directed to the ALJ.
- **Oral Argument:** You are entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. Alternatively, the ALJ may ask for oral argument if, at the close of the hearing, if it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.
- **Date for Filing Post-Hearing Brief:** Before the hearing closes, you may request to file a written brief or proposed findings and conclusions, or both, with the ALJ. The ALJ has the discretion to grant this request and to will set a deadline for filing, up to 35 days.

### III. AFTER THE HEARING

The Rules pertaining to filing post-hearing briefs and the procedures after the ALJ issues a decision are found at Sections 102.42 through 102.48 of the Board's Rules and Regulations. Please note in particular the following:

- **Extension of Time for Filing Brief with the ALJ:** If you need an extension of time to file a post-hearing brief, you must follow Section 102.42 of the Board's Rules and Regulations, which requires you to file a request with the appropriate chief or associate chief administrative law judge, depending on where the trial occurred. You must immediately serve a copy of any request for an extension of time on all other parties and furnish proof of that service with your request. You are encouraged to seek the agreement of the other parties and state their positions in your request.
- **ALJ's Decision:** In due course, the ALJ will prepare and file with the Board a decision in this matter. Upon receipt of this decision, the Board will enter an order transferring the case to the Board and specifying when exceptions are due to the ALJ's decision. The Board will serve copies of that order and the ALJ's decision on all parties.
- **Exceptions to the ALJ's Decision:** The procedure to be followed with respect to appealing all or any part of the ALJ's decision (by filing exceptions with the Board), submitting briefs, requests for oral argument before the Board, and related matters is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be provided to the parties with the order transferring the matter to the Board.

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE

Case  
13-CA-296224Date Filed  
5/20/2022**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer  Starbucks Corporation		b. Tel. No. (206) 318-2212
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code)  155 N Wabash Ave, Chicago, IL 60601	e. Employer Representative  Howard Schultz, CEO	g. e-mail hschultz@starbucks.com
		h. Number of workers employed Approx. 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		

**2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)**

Within the last six months, the Employer has unlawfully retaliated against an employee who is a known union supporter by issuing discipline in a way that discriminated against the employee on the basis of the employee's support for the union.

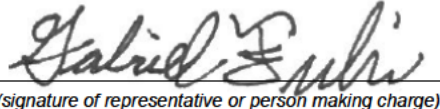
**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**

Workers United

4a. Address (Street and number, city, state, and ZIP code)  Workers United 22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)**

Service Employees International Union

**6. DECLARATION**I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.  
(signature of representative or person making charge)Gabe Frumkin, Attorney  
(Print/type name and title or office, if any)Barnard Iglitzin & Lavitt LLP  
18 West Mercer St., Ste. 400  
Address Seattle, WA 98119

Date 05/20/2022

Tel. No. (206) 257-6012
Office, if any, Cell No.
Fax No. (206) 378-4132
e-mail frumkin@workerlaw.com

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

May 23, 2022

Philadelphia Joint Board, Workers United  
22 South 22nd Street  
Philadelphia, PA 19103

Re: Starbucks Corporation  
Case 13-CA-296224

Dear Sir or Madam:

The charge that you filed in this case on May 20, 2022 has been docketed as case number 13-CA-296224. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and whose e-mail address is [sylvia.posey@nlrb.gov](mailto:sylvia.posey@nlrb.gov). If this Board agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to



take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

May 23, 2022

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a long horizontal stroke at the end.

TIMOTHY L. WATSON  
Regional Director

cc: Gabe Frumkin, Attorney  
Barnard Iglitzin & Lavitt LLP  
18 W Mercer St., Ste 400  
Seattle, WA 98119

# NATIONAL LABOR RELATIONS BOARD NOTICE OF APPEARANCE

STARBUCKS CORPORATION,  <div style="text-align: right;">Employer,</div>	CASE NO.: 13-CA-296224
and	
CHICAGO & MIDWEST REGIONAL JOINT BOARD, WORKERS UNITED/SEIU,  <div style="text-align: right;">Union.</div>	

TO: (Check One Box Only)<sup>1</sup>

- |   |   |   |
|---|---|---|
| <input checked="" type="checkbox"/> <b>REGIONAL DIRECTOR</b><br>NATIONAL LABOR RELATIONS BOARD<br>Region 13<br>219 South Dearborn Street<br>Suite 808<br>Chicago, IL 60604-2027 | <input type="checkbox"/> <b>EXECUTIVE SECRETARY</b><br>NATIONAL LABOR RELATIONS BOARD | <input type="checkbox"/> <b>GENERAL COUNSEL</b><br>NATIONAL LABOR RELATIONS BOARD |
|---|---|---|

**THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF**

Starbucks Corporation

**CHECK THE APPROPRIATE BOX(ES) BELOW:**

- ☒ **REPRESENTATIVE IS AN ATTORNEY**
- ☒ **IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASE HANDLING MANUAL.**

*(REPRESENTATIVE INFORMATION)*

NAME Noah G. Lipschultz Esq.; Alice D. Kirkland, Esq.; Elizabeth Hanford, Esq.

MAILING ADDRESS Littler Mendelson, P.C., 80 South 8th Street, Suite 1300, Minneapolis, MN 55402;  
321 North Clark Street, Suite 1100, Chicago, IL 60654

E-MAIL ADDRESS [nlipschultz@littler.com](mailto:nlipschultz@littler.com); [akirkland@littler.com](mailto:akirkland@littler.com); [ehanford@littler.com](mailto:ehanford@littler.com);  
[starbucksnlrb@littler.com](mailto:starbucksnlrb@littler.com)

OFFICE TELEPHONE NUMBER 612.313.7629; 612.313.7623; 312.795.3248

CELL PHONE NUMBER 773.750.8683; 612.801.5596; 708.490.8607 FAX 651.389.9135; 612.677.3205

SIGNATURE s/Alice D. Kirkland  
*(Please sign in ink)*

DATE June 7, 2022

4866-0757-7892.1 / 055187-1198

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

May 23, 2022

Howard Schultz, CEO  
155 N Wabash Ave  
Chicago, IL 60601

Re: Starbucks Corporation  
Case 13-CA-296224

Dear Mr. Schultz:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and whose e-mail address is [sylvia.posey@nlrb.gov](mailto:sylvia.posey@nlrb.gov). If this Board agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge by June 3, 2022. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not

enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

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Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlrb.gov](http://www.nlrb.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a large initial "T" and "W".

TIMOTHY L. WATSON  
Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341

July 19, 2022

*Via electronic mail unless indicated*

Noah G. Lipschultz, Esq.  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136  
[nlipschultz@littler.com](mailto:nlipschultz@littler.com)

Alice D. Kirkland, Esq.  
Littler Mendelson, P.C.  
80 South 8th Street,  
Suite 1300  
Minneapolis, MN 55402-2136  
[akirkland@littler.com](mailto:akirkland@littler.com)

Elizabeth Hanford, Esq.  
Littler Mendelson, P.C.  
321 North Clark Street  
Suite 1100  
Chicago, IL 60654-4715  
[ehanford@littler.com](mailto:ehanford@littler.com)

Re: Starbucks Corporation  
Case 13-CA-296224

Dear Mr. Lipschultz, Ms. Kirkland, Ms. Hanford:

This is to advise you that I have approved the withdrawal of the charge in the above matter.

Very truly yours,

*/s/ Angie Cowan Hamada*

Angie C. Hamada  
Regional Director

cc: Howard Schultz, CEO  
155 N Wabash Ave  
Chicago, IL 60601  
[hschultz@starbucks.com](mailto:hschultz@starbucks.com)

Robert S. Cervone, Esq.  
Dowd Bloch Bennet Cervone Auerbach &  
Yokich LLP  
8 South Michigan Avenue, Suite 1900  
Chicago, IL 60603-3315  
[rcervone@laboradvocates.com](mailto:rcervone@laboradvocates.com)

Philadelphia Joint Board, Workers United  
22 S. 22nd Street  
Philadelphia, PA 19103  
*Via first class mail*




UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case <b>13-CA-296225</b>	Date Filed <b>5/20/2022</b>

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer  Starbucks Corporation	b. Tel. No. (206) 318-2212
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code)  1070 Bryn Mawr Ave, Chicago, IL 60660	e. Employer Representative  Howard Schultz, CEO
	g. e-mail hschultz@starbucks.com
	h. Number of workers employed Approx. 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  Within the last six months, the Employer has violated the Act by, among other things, unlawfully interrogating employees about their support for the unionization and soliciting grievances during a union organizing campaign.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United	
4a. Address (Street and number, city, state, and ZIP code)  Workers United 22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.   (signature of representative or person making charge) Barnard Iglitzin & Lavitt LLP 18 West Mercer St., Ste. 400 Address Seattle, WA 98119	
Gabe Frumkin, Attorney (Print/type name and title or office, if any)	
Date 05/20/2022	
Tel. No. (206) 257-6012	
Office, if any, Cell No.	
Fax No. (206) 378-4132	
e-mail frumkin@workerlaw.com	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

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UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

May 23, 2022

Howard Schultz  
Starbucks Corporation  
1070 West Bryn Mawr Avenue  
Chicago, IL 60660

Re: Starbucks Corporation  
Case 13-CA-296225

Dear Mr. Schultz:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and email address is [Sylvia.Posey@nlrb.gov](mailto:Sylvia.Posey@nlrb.gov). If this Board agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

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**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge by June 6, 2022. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board

agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

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**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a large initial "T" and "W".

Timothy L. Watson  
Acting Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

May 23, 2022

Philadelphia Joint Board and its  
Local 274, Workers United, a/w SEIU  
22 South 22nd Street  
Philadelphia, PA 19103

Re: Starbucks Corporation  
Case 13-CA-296225

Dear Sir or Madam:

The charge that you filed in this case on May 20, 2022 has been docketed as case number 13-CA-296225. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and email address is [Sylvia.Posey@nlrb.gov](mailto:Sylvia.Posey@nlrb.gov). If this Board agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

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Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Timothy L. Watson  
Acting Regional Director

cc: Gabe Frumkin, Attorney  
Barnard Iglitzin & Lavitt LLP  
18 W Mercer St., Ste 400  
Seattle, WA 98119

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Starbucks Corporation
and
Workers United

CASE 13-CA-296225

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_

Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Noah G. Lipschultz	
MAILING ADDRESS: 1300 IDS Center, 80 S. 8th Street, Minneapolis, MN 55402	
E-MAIL ADDRESS: nlipschultz@littler.com	
OFFICE TELEPHONE NUMBER: 612-630-1000	
CELL PHONE NUMBER:	FAX:
SIGNATURE: s/ Noah G. Lipschultz	
(Please sign in ink.)	
DATE: May 31, 2022	

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.



NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Starbucks Corporation
and
Workers United

CASE 13-CA-296225

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

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(REPRESENTATIVE INFORMATION)

NAME: Alice D. Kirkland	
MAILING ADDRESS: 1300 IDS Center, 80 S. 8th Street, Minneapolis, MN 55402	
E-MAIL ADDRESS: akirkland@littler.com	
OFFICE TELEPHONE NUMBER: 612-630-1000	
CELL PHONE NUMBER:	FAX:
SIGNATURE: s/ Alice D. Kirkland	
DATE: May 31, 2022 (Please sign in ink.)	

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Starbucks Corporation
and
Workers United

CASE 13-CA-296225

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

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(REPRESENTATIVE INFORMATION)

NAME: Elizabeth Hanford	
MAILING ADDRESS: 321 North Clark Street, Suite 1100, Chicago, IL 60654	
E-MAIL ADDRESS: ehanford@littler.com	
OFFICE TELEPHONE NUMBER: 312-372-5520	
CELL PHONE NUMBER:	FAX:
SIGNATURE: s/ Elizabeth Hanford	
DATE: May 31, 2022	

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
First Amended **CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case <b>13-CA-296225</b>	Date Filed <b>7/20/2022</b>

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer  Starbucks Corporation		b. Tel. No. (206) 318-2212
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code)  1070 Bryn Mawr Ave, Chicago, IL 60660	e. Employer Representative  Howard Schultz, CEO	g. e-mail hschultz@starbucks.com
		h. Number of workers employed Approx. 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

**2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)**

Within the last six months, the Employer has violated the Act by, among other things, unlawfully interrogating employees, threatening employees, and making statements that engaging in union activity was futile during a union organizing campaign in violation of Section 7 of the Act.

**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**

Workers United

4a. Address (Street and number, city, state, and ZIP code)  Workers United 22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)**

Service Employees International Union

**6. DECLARATION**

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.



(signature of representative or person making charge)

Robert S Cervone

(Print/type name and title or office, if any)

Date 7/20/22

8 S Michigan Ave., 1000 Chicago 60603

Tel. No.  
312-801-8848

Office, if any, Cell No.

Fax No.

e-mail

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)**  
**PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

July 22, 2022

Howard Schultz  
Starbucks Corporation  
1070 West Bryn Mawr Avenue  
Chicago, IL 60660

Re: Starbucks Corporation  
Case 13-CA-296225

Dear Mr. Schultz:

Enclosed is a copy of the first amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and whose email address is [Sylvia.Posey@nlrb.gov](mailto:Sylvia.Posey@nlrb.gov). If the agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlr.gov](http://www.nlr.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to

comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink, appearing to read "Angie C. Hamada", with a long horizontal flourish extending to the right.

Angie C. Hamada  
Regional Director

Enclosure: Copy of first amended charge

cc: Noah G. Lipschultz, Attorney  
Littler Mendelson, P.C.  
1300 IDS Center  
80 S 8th Street  
Minneapolis, MN 55402-2136

Alice D. Kirkland, Esq.  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136

Elizabeth Hanford  
321 N. Clark Street, Suite 1100  
Chicago, IL 60654



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

July 22, 2022

Philadelphia Joint Board and its Local 274, Workers United, a/w SEIU  
121 S. Broad Street, Suite 1300  
Philadelphia, PA 19103

Re: Starbucks Corporation  
Case 13-CA-296225

Dear Sir or Madam:

We have docketed the first amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Attorney Sylvia L. Posey whose telephone number is (312)353-7617 and whose email address is [Sylvia.Posey@nlrb.gov](mailto:Sylvia.Posey@nlrb.gov). If the agent is not available, you may contact Deputy Regional Attorney Jessica T. Muth whose telephone number is (312)353-7643.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink, appearing to read "Angie C. Hamada", with a long horizontal flourish extending to the right.

Angie C. Hamada  
Regional Director

cc: Robert S. Cervone, Attorney  
Dowd Bloch Bennet Cervone Auerbach &  
Yokich LLP  
8 South Michigan Avenue, Suite 1900  
Chicago, IL 60603-3315

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

## DO NOT WRITE IN THIS SPACE

Case

13-CA-297377

Date Filed

6-09-2022

## INSTRUCTIONS:

File an original and 4 copies of this charge with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Number of workers employed 20
c. Address (street, city, state, ZIP code) 3300 W. Grand Avenue Waukegan, IL 60085	d. Employer Representative Howard Schultz, CEO	e. Telephone No. 847-599-1618
f. Type of Establishment (factory, mine, wholesaler, etc.) retail	g. Identify principal product or service coffee and food	
h. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act.		

During the past six months, the above-named employer, by its officers and agents, has threatened (b) (6), (b) (7)(C) that (b) (6), (b) (7)(C) would not be able to transfer back to (b) (6), (b) (7)(C) home store if (b) (6), (b) (7)(C) were represented by Workers United. It later refused to approve (b) (6), (b) (7)(C) transfer back to (b) (6), (b) (7)(C) home store, and it has denied (b) (6), (b) (7)(C) work opportunities, because (b) (6), (b) (7)(C) joined and supported Workers United.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

4a. Address (street and number, city, state, and ZIP code)

22 South 22<sup>nd</sup> Street, Philadelphia, PA. 19103

4b. Telephone No.

646-448-6414

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union

## 6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

By /s/ Robert E. Bloch

(signature of representative or person making charge)

Attorney

(title if any)

Address Dowd, Bloch, Bennett, Cervone, Auerbach & Yokich, LLP  
8 S. Michigan Ave., 19<sup>th</sup> floor, Chicago, IL 60603

312-372-1361

rebloch@laboradvocates  
.com

June 9, 2022

(Telephone No.)

(date)





UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

June 10, 2022

Workers United  
22 South 22nd Street  
Philadelphia, PA

Re: Starbucks Corporation  
Case 13-CA-297377

Dear Sir or Madam:

The charge that you filed in this case on June 09, 2022 has been docketed as case number 13-CA-297377. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner Jay B. Greenhill whose telephone number is (312)353-7628 and email address is [Jay.Greenhill@nlrb.gov](mailto:Jay.Greenhill@nlrb.gov). If this Board agent is not available, you may contact Supervisory Field Examiner Paul Prokop whose telephone number is (312)353-7171.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

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We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a large initial "T" and "W".

Timothy L. Watson  
Acting Regional Director

cc: Robert E. Bloch  
Dowd, Bloch, Bennett, Cervone,  
Auerbach & Yokich  
8 South Michigan Avenue 19th Floor  
Chicago, IL 60603



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

June 10, 2022

Howard Schultz, CEO  
Starbucks Corporation  
3300 W. Grand Avenue  
Waukegan, IL 60085

Re: Starbucks Corporation  
Case 13-CA-297377

Dear Mr. Schultz:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner Jay B. Greenhill whose telephone number is (312)353-7628 and email address is [Jay.Greenhill@nlrb.gov](mailto:Jay.Greenhill@nlrb.gov). If this Board agent is not available, you may contact Supervisory Field Examiner Paul Prokop whose telephone number is (312)353-7171.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge by June 24, 2022. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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have access to the means for filing electronically or why filing electronically would impose an undue burden.

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We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with a large initial "T" and "W".

Timothy L. Watson  
Acting Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341

June 27, 2022

*Via electronic mail unless indicated*

Howard Schultz, President and CEO  
Starbucks Corporation  
1190 Selmi Drive Suite 100  
Reno, NV 89512

*Via first class mail*

Re: Starbucks Corporation  
Case 13-CA-297377

Dear Mr. Schultz:

This is to advise you that I have approved the withdrawal of the charge in the above matter.

Very truly yours,

*/s/ Paul Hitterman*

Paul Hitterman  
Acting Regional Director

cc: Robert E. Bloch, Esq.  
Dowd, Bloch, Bennett, Cervone,  
Auerbach & Yokich  
8 South Michigan Avenue  
19th Floor  
Chicago, IL 60603  
[rebloch@laboradvocates.com](mailto:rebloch@laboradvocates.com)

Workers United  
22 South 22nd Street  
Philadelphia, PA 16103  
*Via first class mail*

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case  
**13-CA-297565**Date Filed  
**6/13/2022**

## INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks		b. Tel. No. (847) 256-9157
		c. Cell No. (b) (6), (b) (7)(C)
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 3232 Lake Ave #8  IL Wilmette 60091	e. Employer Representative (b) (6), (b) (7)(C)	g. e-mail
		h. Number of workers employed 13
i. Type of Establishment (factory, mine, wholesaler, etc.) Beverages (Nonalcoholic)	j. Identify principal product or service Coffee	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 3 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

--See additional page--

(b) (6), (b) (7)(C) filing charge (if labor organization, give full name, including local name and number)

4a. Address (Street and number, city, state, and ZIP code) (b) (6), (b) (7)(C)	4b. Tel. No. (b) (6), (b) (7)(C)
	4c. Cell No. (b) (6), (b) (7)(C)
	4d. Fax No.
	4e. e-mail (b) (6), (b) (7)(C)

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(signature of representative or person making charge)

(Print/type name and title or office, if any)

(b) (6), (b) (7)(C)

Address

Date 06/13/2022 05:44:23 PM

Tel. No.  
(b) (6), (b) (7)(C)Office, if any, Cell No.  
(b) (6), (b) (7)(C)

Fax No.

e-mail  
(b) (6), (b) (7)(C)WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



## Basis of the Charge

### 8(a)(3)

Within the previous six months, the Employer discharged an employee(s) because the employee(s) joined or supported a labor organization and in order to discourage union activities and/or membership.

Name of employee discharged	Approximate date of discharge
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) 2022



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

June 14, 2022

(b) (6), (b) (7)(C)

Starbucks  
3232 Lake Avenue, #8  
Wilmette, IL 60091

Re: Starbucks  
Case 13-CA-297565

Dear (b) (6), (b) (7)(C):

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner Jay B. Greenhill whose telephone number is (312)353-7628 and whose email address is **Jay.Greenhill@nlrb.gov**. If this Board agent is not available, you may contact Supervisory Field Examiner Paul Prokop whose telephone number is (312)353-7171.

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Very truly yours,

A handwritten signature in black ink, appearing to read "Timothy L. Watson". The signature is fluid and cursive, with the first name "Timothy" and last name "Watson" clearly distinguishable.

TIMOTHY L. WATSON  
Acting Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 13  
Dirksen Federal Building  
219 South Dearborn Street, Suite 808  
Chicago, IL 60604-2027

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (312)353-7570  
Fax: (312)886-1341



Download  
NLRB  
Mobile App

June 14, 2022

(b) (6), (b) (7)(C)

Re: Starbucks  
Case 13-CA-297565

Dear (b) (6), (b) (7)(C):

The charge that you filed in this case on June 13, 2022 has been docketed as case number 13-CA-297565. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner Jay B. Greenhill whose telephone number is (312)353-7628 and whose email address is **Jay.Greenhill@nlrb.gov**. If this Board agent is not available, you may contact Supervisory Field Examiner Paul Prokop whose telephone number is (312)353-7171.

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Very truly yours,

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TIMOTHY L. WATSON  
Acting Regional Director

# NATIONAL LABOR RELATIONS BOARD NOTICE OF APPEARANCE

STARBUCKS CORPORATION,

Employer,

and

CHICAGO & MIDWEST REGIONAL JOINT  
BOARD, WORKERS UNITED/SEIU,

Union.

CASE NO.: 13-CA-297565

TO: (Check One Box Only)<sup>1</sup>

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> REGIONAL DIRECTOR<br>NATIONAL LABOR RELATIONS BOARD<br>Region 13<br>219 South Dearborn Street<br>Suite 808<br>Chicago, IL 60604-2027 | <input type="checkbox"/> EXECUTIVE SECRETARY<br>NATIONAL LABOR RELATIONS BOARD | <input type="checkbox"/> GENERAL COUNSEL<br>NATIONAL LABOR RELATIONS BOARD |
|--|--|--|

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF

Starbucks Corporation

CHECK THE APPROPRIATE BOX(ES) BELOW:

- ☒ REPRESENTATIVE IS AN ATTORNEY
- ☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASE HANDLING MANUAL.

*(REPRESENTATIVE INFORMATION)*

NAME Noah G. Lipschultz Esq.; Alice D. Kirkland, Esq.; Elizabeth Hanford, Esq.

MAILING ADDRESS Littler Mendelson, P.C., 80 South 8th Street, Suite 1300, Minneapolis, MN 55402;  
321 North Clark Street, Suite 1100, Chicago, IL 60654

E-MAIL ADDRESS [nlipschultz@littler.com](mailto:nlipschultz@littler.com); [akirkland@littler.com](mailto:akirkland@littler.com); [ehanford@littler.com](mailto:ehanford@littler.com);  
[starbucksnlrb@littler.com](mailto:starbucksnlrb@littler.com)

OFFICE TELEPHONE NUMBER 612.313.7629; 612.313.7623; 312.795.3248

CELL PHONE NUMBER 773.750.8683; 612.801.5596; 708.490.8607 FAX 651.389.9135; 612.677.3205

SIGNATURE s/Alice D. Kirkland  
*(Please sign in ink)*

DATE July 6, 2022

4888-1885-1879.1 / 055187-1198

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.



UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE

Case

25-CA-292501

Date Filed

03/18/2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Tel. No. (619) 632-7773
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South  WA Seattle 98134	e. Employer Representative  Howard Schultz President	g. e-mail
		h. Number of workers employed 15
i. Type of Establishment (factory, mine, wholesaler, etc.) Restaurants	j. Identify principal product or service coffee	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 4,3 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

--See additional page--

3. Full name of party filing charge (if labor organization, give full name, including local name and number)  
Peter Demay

Chicago and Midwest Regional Joint Board, Workers United/SEIU

4a. Address (Street and number, city, state, and ZIP code)  333 S. Ashland Ave IL Chicago 60607	4b. Tel. No. (312) 738-6100
	4c. Cell No.
	4d. Fax No.
	4e. e-mail pdemay@cmrjb.org

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.



Josiah Aeschliman Groff

(signature of representative or person making charge)

(Print/type name and title or office, if any)

8 S. Michigan Ave. 1900

Address Chicago IL 60603

Date 03/18/2022 02:03:37 PM

Tel. No.

(312) 372-1361

Office, if any, Cell No.

Fax No.

(312) 372-6599

e-mail

JGroff@laboradvocates.com

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## Basis of the Charge

### 8(a)(3)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) joined or supported a labor organization and in order to discourage union activities and/or membership.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
(b) (6), (b) (7)(C)	written warning	(b) (6), (b) (7)(C) 2022

### 8(a)(4)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) filed charges or cooperated with the NLRB.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
(b) (6), (b) (7)(C)	written warning	(b) (6), (b) (7)(C) 2022



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 33  
101 SW Adams St  
Suite 400  
Peoria, IL 61602

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (309)671-7080  
Fax: (309)671-7095



Download  
NLRB  
Mobile App

March 21, 2022

Howard Schultz, President  
Starbucks Corporation  
2401 Utah Avenue South  
Seattle, WA 98134

Re: Starbucks Corporation  
Case 25-CA-292501

Dear Mr. Schultz:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner TIFFANY L. MILLER whose telephone number is (309)218-1729. If this Board agent is not available, you may contact Assistant to the Regional Director COLLEEN MAPLES whose telephone number is (317)991-7646.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlrb.gov](http://www.nlrb.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge by April 4, 2022. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the

investigation. In this way, the case can be fully investigated more quickly. **Due to the nature of the allegations in the enclosed unfair labor practice charge, we have identified this case as one in which injunctive relief pursuant to Section 10(j) of the Act may be appropriate.** Therefore, in addition to investigating the merits of the unfair labor practice allegations, the Board agent will also inquire into those factors relevant to making a determination as to whether or not 10(j) injunctive relief is appropriate in this case. Accordingly, please include your position on the appropriateness of Section 10(j) relief when you submit your evidence relevant to the investigation.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case **MUST** be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all

evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

PATRICIA K. NACHAND  
Regional Director

By: /s/ Nathaniel E. Strickler

NATHANIEL E. STRICKLER  
Officer in Charge

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 33  
101 SW Adams St  
Suite 400  
Peoria, IL 61602

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (309)671-7080  
Fax: (309)671-7095



Download  
NLRB  
Mobile App

March 21, 2022

Peter Demay  
Chicago and Midwest Regional Joint Board,  
Workers United/SEIU  
333 S. Ashland Ave  
Chicago, IL 60607

Re: Starbucks Corporation  
Case 25-CA-292501

Dear Mr. Demay:

The charge that you filed in this case on March 18, 2022 has been docketed as case number 25-CA-292501. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner TIFFANY L. MILLER whose telephone number is (309)218-1729. If this Board agent is not available, you may contact Assistant to the Regional Director COLLEEN MAPLES whose telephone number is (317)991-7646.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlrb.gov](http://www.nlrb.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present

your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

**Due to the nature of the allegations in the enclosed unfair labor practice charge, we have identified this case as one in which injunctive relief pursuant to Section 10(j) of the Act may be appropriate.** Therefore, in addition to investigating the merits of the unfair labor practice allegations, the Board agent will also inquire into those factors relevant to making a determination as to whether or not 10(j) injunctive relief is appropriate in this case. Accordingly, please include your position on the appropriateness of Section 10(j) relief when you submit your evidence relevant to the investigation.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

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you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

PATRICIA K. NACHAND  
Regional Director

By: /s/ Nathaniel E. Strickler

NATHANIEL E. STRICKLER  
Officer in Charge

cc: Josiah Aeschliman Groff  
Dowd, Bloch, Bennett, Cervone  
8 S. Michigan Ave. 1900  
Chicago, IL 60603



NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Starbucks Corporation
and
Chicago and Midwest Regional Joint Board, Workers United/SEIU

CASE 25-CA-292501

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_

Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Noah G. Lipschultz and Alice Kirkland	
MAILING ADDRESS: 1300 IDS Center, 80 S. 8th Street, Minneapolis, MN 55402	
E-MAIL ADDRESS: nlipschultz@littler.com; akirkland@littler.com; StarbucksNLRB@littler.com	
OFFICE TELEPHONE NUMBER: 612-630-1000	
CELL PHONE NUMBER:	FAX:
SIGNATURE: s/ Noah G. Lipschultz	
(Please sign in ink.)	
DATE: April 25, 2022	

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Starbucks Corporation

and

Chicago and Midwest Regional Joint Board, Workers  
United/SEIU

CASE 25-CA-292501

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_

Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Noah G. Lipschultz and Alice Kirkland

MAILING ADDRESS: 1300 IDS Center, 80 S. 8th Street, Minneapolis, MN 55402

E-MAIL ADDRESS: nlipschultz@littler.com; akirkland@littler.com; StarbucksNLRB@littler.com

OFFICE TELEPHONE NUMBER: 612-630-1000

CELL PHONE NUMBER: \_\_\_\_\_ FAX: \_\_\_\_\_

SIGNATURE: S/ Alice D. Kirkland

(Please sign in ink.)  
DATE: April 26, 2022

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 25  
SUBREGION 33

STARBUCKS CORPORATION

and

Case 25-CA-292501

CHICAGO AND MIDWEST REGIONAL  
JOINT BOARD, WORKERS UNITED/SEIU

COMPLAINT AND NOTICE OF HEARING

This Complaint and Notice of Hearing is based on a charge filed by the Chicago and Midwest Regional Joint Board, Workers United/SEIU (the Union). It is issued pursuant to Section 10(b) of the National Labor Relations Act, 29 U.S.C. Sec. 151 et seq. (the Act), and Section 102.15 of the Rules and Regulations of the National Labor Relations Board (the Board) and alleges that Starbucks Corporation (Respondent) has violated the Act as described below:

1. The charge in Case 25-CA-292501 was filed by the Union on March 18, 2022, and a copy was served by mail on Respondent on March 21, 2022.

2. (a) At all material times Respondent, a corporation, with its headquarters located in Seattle, Washington, and facilities located throughout the United States, including a facility located at 1200 West Main Street, Peoria, Illinois, herein called Respondent's facility, has been engaged in the retail sale of food and beverages.

(b) During the past 12 months Respondent, in conducting its business operations described above in paragraph 2(a), derived gross revenues in excess of \$500,000.

(c) During the past 12 months Respondent, in conducting its business operations described above in paragraph 2(a), purchased and received at its Peoria, Illinois, facilities goods valued in excess of \$5,000 directly from points outside the State of Indiana.

(d) At all material times Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

3. At all material times the Union has been a labor organization within the meaning of Section 2(5) of the Act.

4. At all material times the following individuals held the positions set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the Act and agents of Respondent within the meaning of Section 2(13) of the Act:

(b) (6), (b) (7)(C)  
(b) (6), (b) (7)(C)

5. (a) About (b) (6), (b) (7)(C), 2022, Respondent issued a written warning to its employee (b) (6), (b) (7)(C)

(b) Respondent engaged in the conduct described above in paragraph 5(a) because the named employee of Respondent formed, joined, and assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

(c) Respondent engaged in the conduct described above in paragraph 5(a) because (b) (6), (b) (7)(C) was subpoenaed and intended to attend a Board proceeding in Case 25-RC-290625.

6. By the conduct described above in paragraphs 5(a) and 5(b), Respondent has been discriminating in regard to the hire or tenure or terms or conditions of employment of its employees, thereby discouraging membership in a labor organization in violation of Section 8(a)(1) and (3) of the Act.

7. By the conduct described above in paragraphs 5(a) and 5(c), Respondent has been discriminating against employees for filing charges or giving testimony under the Act in violation of Section 8(a)(1) and (4) of the Act.

8. The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

WHEREFORE, as part of the remedy for the unfair labor practices alleged above in paragraphs 5, 6, and 7, the General Counsel seeks an Order requiring, in addition to the conventional posting, that Respondent distribute a signed copy of the Administrative Law Judge's/Board's Notice in this matter:

(a) by posting it on its intranet or similar internal site, including the Starbucks Partner Hub, where it can be accessed by employees, supervisors, and managers;

(b) by emailing it to all current employees and former employees who were employed at Respondent's facility at any time since March 15, 2022;

(c) by sending it via any text-based mobile messaging platform (e.g. SMS, iMessage, WhatsApp, Snapchat, Kik, Slack, etc.) to all current employees and former employees who were employed at Respondent's facility at any time since March 15, 2022; and

(d) by emailing it to all supervisors and managers, including district managers, who have managed or supervised employees working at Respondent's facility at any time since March 15, 2022.

The General Counsel further seeks, as part of the remedy for the unfair labor practices alleged above in paragraphs 5, 6, and 7, that Respondent shall permit, within 60 days, representatives from the National Labor Relations Board to conduct training sessions via videoconference on employee rights under the National Labor Relations Act for the

Respondent's managers and supervisors, including district managers, who have managed or supervised employees working at Respondent's facility at any time since March 15, 2022. The National Labor Relations Board will create the content of the training and the goal of that content will be to educate managers and supervisors on employee rights under the Act, with specific regard to the unfair labor practices alleged above in paragraphs 5, 6, and 7. The training session will last approximately one (1) hour. The Charged Party is responsible for all costs associated with the videoconference training.

The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

#### ANSWER REQUIREMENT

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before August 1, 2022.** Respondent also must serve a copy of the answer on each of the other parties.

The answer must be filed electronically through the Agency's website. To file electronically, go to [www.nlr.gov](http://www.nlr.gov), click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. Responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an

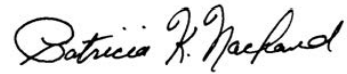
answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

#### NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on October 26, 2022, at 9:00 a.m. CT, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. The hearing will be conducted via videoconference using the Zoom for Government platform. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668.

The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated: July 18, 2022



---

PATRICIA K. NACHAND  
REGIONAL DIRECTOR  
NATIONAL LABOR RELATIONS BOARD  
REGION 25/SUBREGION 33  
101 SW Adams, 4<sup>th</sup> Floor  
Peoria, Illinois 61602

Attachments



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
**NOTICE**

Case 25-CA-292501

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

Howard Schultz , President  
Starbucks Corporation  
2401 Utah Avenue South  
Seattle, WA 98134

Noah G. Lipschultz , Attorney  
Littler Mendelson, P.C.  
1300 IDS Center  
80 S 8th St  
Minneapolis, MN 55402-2136

Alice D. Kirkland , Esq.  
Littler Mendelson, P.C.  
1300 IDS Center, 80 S. 8th Street  
Minneapolis, MN 55402-2136

Peter Demay  
Chicago and Midwest Regional  
Joint Board, Workers United/SEIU  
333 S. Ashland Ave  
Chicago, IL 60607

Josiah Aeschliman Groff  
Dowd, Bloch, Bennett, Cervone  
8 S. Michigan Ave., 1900  
Chicago, IL 60603

## Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: [www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules\\_and\\_regs\\_part\\_102.pdf](http://www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf).

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at [www.nlr.gov](http://www.nlr.gov), click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

**Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement.** The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

### I. BEFORE THE HEARING

The rules pertaining to the Board's pre-hearing procedures, including rules concerning filing an answer, requesting a postponement, filing other motions, and obtaining subpoenas to compel the attendance of witnesses and production of documents from other parties, may be found at Sections 102.20 through 102.32 of the Board's Rules and Regulations. In addition, you should be aware of the following:

- **Special Needs:** If you or any of the witnesses you wish to have testify at the hearing have special needs and require auxiliary aids to participate in the hearing, you should notify the Regional Director as soon as possible and request the necessary assistance. Assistance will be provided to persons who have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603.
- **Pre-hearing Conference:** One or more weeks before the hearing, the ALJ may conduct a telephonic prehearing conference with the parties. During the conference, the ALJ will explore whether the case may be settled, discuss the issues to be litigated and any logistical issues related to the hearing, and attempt to resolve or narrow outstanding issues, such as disputes relating to subpoenaed witnesses and documents. This conference is usually not recorded, but during the hearing the ALJ or the parties sometimes refer to discussions at the pre-hearing conference. You do not have to wait until the prehearing conference to meet with the other parties to discuss settling this case or any other issues.

### II. DURING THE HEARING

The rules pertaining to the Board's hearing procedures are found at Sections 102.34 through 102.43 of the Board's Rules and Regulations. Please note in particular the following:

- **Witnesses and Evidence:** At the hearing, you will have the right to call, examine, and cross-examine witnesses and to introduce into the record documents and other evidence.
- **Exhibits:** Each exhibit offered in evidence must be provided in duplicate to the court reporter and a copy of each of each exhibit should be supplied to the ALJ and each party when the exhibit is offered

**in evidence.** If a copy of any exhibit is not available when the original is received, it will be the responsibility of the party offering such exhibit to submit the copy to the ALJ before the close of hearing. If a copy is not submitted, and the filing has not been waived by the ALJ, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

- **Transcripts:** An official court reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the ALJ for approval. Everything said at the hearing while the hearing is in session will be recorded by the official reporter unless the ALJ specifically directs off-the-record discussion. If any party wishes to make off-the-record statements, a request to go off the record should be directed to the ALJ.
- **Oral Argument:** You are entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. Alternatively, the ALJ may ask for oral argument if, at the close of the hearing, if it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.
- **Date for Filing Post-Hearing Brief:** Before the hearing closes, you may request to file a written brief or proposed findings and conclusions, or both, with the ALJ. The ALJ has the discretion to grant this request and to will set a deadline for filing, up to 35 days.

### III. AFTER THE HEARING

The Rules pertaining to filing post-hearing briefs and the procedures after the ALJ issues a decision are found at Sections 102.42 through 102.48 of the Board's Rules and Regulations. Please note in particular the following:

- **Extension of Time for Filing Brief with the ALJ:** If you need an extension of time to file a post-hearing brief, you must follow Section 102.42 of the Board's Rules and Regulations, which requires you to file a request with the appropriate chief or associate chief administrative law judge, depending on where the trial occurred. You must immediately serve a copy of any request for an extension of time on all other parties and furnish proof of that service with your request. You are encouraged to seek the agreement of the other parties and state their positions in your request.
- **ALJ's Decision:** In due course, the ALJ will prepare and file with the Board a decision in this matter. Upon receipt of this decision, the Board will enter an order transferring the case to the Board and specifying when exceptions are due to the ALJ's decision. The Board will serve copies of that order and the ALJ's decision on all parties.
- **Exceptions to the ALJ's Decision:** The procedure to be followed with respect to appealing all or any part of the ALJ's decision (by filing exceptions with the Board), submitting briefs, requests for oral argument before the Board, and related matters is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be provided to the parties with the order transferring the matter to the Board.

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 25  
SUBREGION 33**

STARBUCKS CORPORATION

Respondent

Case No. 25-CA-292501

and

CHICAGO AND MIDWEST REGIONAL JOINT  
BOARD, WORKERS UNITED/SEIU

Charging Party

**RESPONDENT’S ANSWER TO COMPLAINT AND NOTICE OF HEARING**

Respondent Starbucks Corporation (“Respondent”) hereby files this Answer to the Regional Director’s Complaint and Notice of Hearing (“Complaint”), as follows:

1. The Charge in Case 25-CA-292501 was filed by the Union on March 18, 2022, and a copy was served by mail on Respondent on March 21, 2022.

**Answer: Based on information and belief, Respondent admits the allegations set forth in Paragraph 1 of the Complaint.**

2. (a) At all material times Respondent, a corporation, with its headquarters located in Seattle, Washington, and facilities located throughout the United States, including a facility located at 1200 West Main Street, Peoria, Illinois, herein called Respondent’s facility, has been engaged in the retail sale of food and beverages.

**Answer: Respondent admits the allegations set forth in Paragraph 2(a) of the Complaint.**

(b) During the past 12 months Respondent, in conducting its business operations described above in paragraph 2(a), derived gross revenues in excess of \$500,000.

**Answer: Respondent admits the allegations set forth in Paragraph 2(b) of the Complaint.**

(c) During the past 12 months Respondent, in conducting its business operations described above in paragraph 2(a), purchased and received at its Peoria, Illinois, facilities goods valued in excess of \$5,000 directly from points outside the State of Indiana.

**Answer: Respondent admits the allegations in Paragraph 2(c) of the Complaint, insofar as the allegation was meant to refer to the State of Illinois. To the extent the allegation was meant to refer to the State of Indiana, Respondent denies the allegations.**

(d) At all material times Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

**Answer: Respondent admits the allegations set forth in Paragraph 2(d) of the Complaint.**

3. At all material times the Union has been a labor organization within the meaning of Section 2(5) of the Act.

**Answer: Based on information and belief, Respondent admits the allegations set forth in Paragraph 3 of the Complaint.**

4. At all material times the following individuals held the positions set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the Act and agents of Respondent within the meaning of Section 2(13) of the Act:

**(b) (6), (b) (7)(C)**

**(b) (6), (b) (7)(C)**

**Answer:** Respondent denies that that the allegations in Paragraph 4 apply “at all material times” because that phrase is not defined or limited in the Complaint. With this limitation, Respondent admits that (b) (6), (b) (7)(C) is (b) (6), (b) (7)(C) for Respondent and (b) (6), (b) (7)(C) is (b) (6), (b) (7)(C) for Respondent. Respondent admits that both (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) are supervisors within the meaning of Section 2(11) of the Act and are agents of Respondent within the meaning of Section 2(13) of the Act.

5. (a) About (b) (6), (b) (7)(C) 2022, Respondent issued a written warning to its employee (b) (6), (b) (7)(C)

**Answer:** Respondent admits the allegations in Paragraph 5(a) of the Complaint.

(b) Respondent engaged in the conduct described above in paragraph 5(a) because the named employee of Respondent formed, joined, and assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

**Answer:** Respondent denies the allegations in Paragraph 5(b) of the Complaint.

(c) Respondent engaged in the conduct described above in paragraph 5(a) because (b) (6), (b) (7)(C) was subpoenaed and intended to attend a Board proceeding in Case 25-RC-290625.

**Answer:** Respondent denies the allegations in Paragraph 5(c) of the Complaint.

6. By the conduct described above in paragraphs 5(a) and 5(b), Respondent has been discriminating in regard to the hire or tenure or terms or conditions of employment of its employees, thereby discouraging membership in a labor organization in violation of Section 8(a)(1) and (3) of the Act.

**Answer:** Respondent denies the allegations in Paragraph 6 of the Complaint.

7. By the conduct described above in paragraphs 5(a) and 5(c), Respondent has been discriminating against employees for filing charges or giving testimony under the Act in violation of Section 8(a)(1) and (4) of the Act.

**Answer: Respondent denies the allegations in Paragraph 7 of the Complaint.**

8. The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

**Answer: Respondent denies the allegation in Paragraph 8 of the Complaint.**

#### **WHEREFORE Clauses and Demand for Relief**

WHEREFORE, as part of the remedy for the unfair labor practices alleged above in paragraphs 5, 6, and 7, the General Counsel seeks an Order requiring, in addition to the conventional posting, that Respondent distribute a signed copy of the Administrative Law Judge's/Board's Notice in this matter:

(a) by posting it on its intranet or similar internal site, including the Starbucks Partner Hub, where it can be accessed by employees, supervisors, and managers:

(b) by emailing it to all current employees and former employees who were employed at Respondent's facility at any time since March 15, 2022;

(c) by sending it via any text-based mobile messaging platform (e.g. SMS, iMessage, WhatsApp, Snapchat, Kik, Slack, etc.) to all current employees and former employees who were employed at Respondent's facility at any time since March 15, 2022; and

(d) by emailing it to all supervisors and managers, including district managers, who have managed or supervised employees working at Respondent's facility at any time since March 15, 2022.



The General Counsel further seeks, as part of the remedy for the unfair labor practices alleged above in paragraphs 5, 6, and 7, that Respondent shall permit, within 60 days, representatives from the National Labor Relations Board to conduct training sessions via videoconference on employee rights under the National Labor Relations Act for the Respondent's managers and supervisors, including district managers, who have managed or supervised employees working at Respondent's facility at any time since March 15, 2022. The National Labor Relations Board will create the content of the training and the goal of that content will be to educate managers and supervisors on employee rights under the Act, with specific regard to the unfair labor practices alleged above in paragraphs 5, 6, and 7. The training session will last approximately one (1) hour. The Charged Party is responsible for all cost associated with the videoconference training.

**Answer: Respondent denies the allegations in WHEREFORE Clauses and Demand for Relief provided in the Complaint. Respondent further denies that it violated the Act and denies that any relief is appropriate.**

#### **AFFIRMATIVE AND OTHER DEFENSES**

1. The allegations in the Complaint fail to state a claim upon which relief may be granted.
2. The allegations in the Complaint are impermissibly vague and ambiguous and a denial of due process.
3. The allegations in the Complaint, and the charges underlying the Complaint, were filed and made in bad faith, and for vexatious and improper purposes, including to infringe upon Respondent's rights and the operation of its business.
4. To the extent that the Complaint contains allegations that are beyond the scope of

the charge, such allegations are barred.

5. Respondent has acted at all times in good faith and in compliance with the Act and pursuant to its well-established rules and practices.

6. Respondent acted at all times in accordance with its lawful property and managerial rights.

7. None of the alleged violations of the Act are predicated upon conduct that could be found to have interfered with, restrained, or coerced any employees in the exercise of rights guaranteed in Section 7 of the Act.

8. The National Labor Relations Board is not empowered to substitute its judgment for Respondent's lawful employment decisions.

9. Any statement made by any of Respondent's supervisor's and/or agents fall within the ambit of Section 8(c) of the Act, and as such, neither constitutes nor can be used as evidence of an unfair labor practice.

10. The conduct alleged in the Complaint had a de minimis impact, if any, on rights guaranteed by Section 7 of the Act and thus no remedy exists that would further the purposes of the Act.

11. Insofar as this case comes before the Board, Members Gwynne Wilcox and David Prouty should recuse themselves based on their past, present, and perceived relationship with the Service Employees ("SEIU") International and Local Unions, and their affiliates, including the Charging Party Workers United.

12. Respondent reserves the right to amend, modify, revise and plead further any additional defenses, affirmative or otherwise, during the course of these proceedings.

**WHEREFORE**, Respondent Starbucks Corporation prays that an Order dismissing the

Complaint in its entirety, with prejudice, be entered and that Respondent have such other and further relief to which it may be entitled.

Respectfully submitted,

/s/ Noah G. Lipschultz

Noah G. Lipschultz (MN Bar No. 0387308)

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Alice D. Kirkland (MN Bar No. 0396554)

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LITTLER MENDELSON, P.C.

321 North Clark Street, Suite 1100

Chicago, IL 60654

Telephone: 312.372.5520

*Attorneys for Respondent Starbucks  
Corporation*

Dated: August 1, 2022

### **CERTIFICATE OF SERVICE**

I hereby certify that, on this 1st day of August, 2022, the foregoing *Respondent's Answer to Complaint and Notice of Hearing* in Case No. 25-CA-292501 was filed with the NLRB's Division of Judges via the Agency's E-Filing System, and that a copy of the foregoing was served upon the following parties via electronic mail:

Robert S. Cervone, Attorney  
Dowd, Bloch, Bennett, Cervone, Auerbach & Yokich LLP  
[rcervone@laboradvocates.com](mailto:rcervone@laboradvocates.com)

Patricia K. Nachand, Regional Director  
NATIONAL LABOR RELATIONS BOARD  
Region 25/Subregion 33  
[patricia.nachand@nlrb.gov](mailto:patricia.nachand@nlrb.gov)

Tiffany L. Miller  
NATIONAL LABOR RELATIONS BOARD  
Region 25  
[Tiffany.miller@nlrb.gov](mailto:Tiffany.miller@nlrb.gov)

/s/ Alice D. Kirkland  
An Attorney for Respondent

4867-5624-7338.1 / 055187-1198

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Starbucks Corporation

and

Chicago and Midwest Regional Joint Board, Workers  
United/SEIU

CASE 25-CA-292501

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_

Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Elizabeth Hanford

MAILING ADDRESS: Littler Mendelson, PC, 321 North Clark Street, Suite 1100, Chicago, IL 60654

E-MAIL ADDRESS: EHanford@littler.com; StarbucksNLRB@littler.com

OFFICE TELEPHONE NUMBER: (312) 795-3248

CELL PHONE NUMBER: (708) 490-8607 FAX: 312-372-7880

SIGNATURE:



(Please sign in ink.)

DATE: August 1, 2022

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 25  
SUBREGION 33

STARBUCKS CORPORATION

and

Cases 25-CA-292501  
25-CA-296190

CHICAGO AND MIDWEST REGIONAL  
JOINT BOARD, WORKERS UNITED/SEIU

ORDER CONSOLIDATING CASES, CONSOLIDATED COMPLAINT  
AND NOTICE OF HEARING

Pursuant to Section 102.33 of the Rules and Regulations of the National Labor Relations Board (the Board) and to avoid unnecessary costs or delay, IT IS ORDERED THAT Case 25-CA-292501 filed by Chicago and Midwest Regional Joint Board, Workers United/SEIU (the Union) against Starbucks Corporation (Respondent), in which a Complaint and Notice of Hearing issued on July 18, 2022, is consolidated with Case 25-CA-296190 filed by the Union against Respondent.

This Order Consolidating Cases, Consolidated Complaint and Notice of Hearing, which is based on these charges, is issued pursuant to Section 10(b) of the National Labor Relations Act (the Act), 29 U.S.C. § 151 et seq., and Section 102.15 of the Board's Rules and Regulations, and alleges Respondent has violated the Act as described below.

1. (a) The charge in Case 25-CA-292501 was filed by the Union on March 18, 2022, and a copy was served by mail on Respondent on March 21, 2022.

(b) The original charge in Case 25-CA-296190 was filed by the Union on May 20, 2022, and a copy was served by mail on Respondent on May 23, 2022.

(c) The amended charge in Case 25-CA-296190 was filed by the Union on August 12, 2022, and a copy was served by mail on Respondent on August 15, 2022.

2. (a) At all material times Respondent, a corporation, with its headquarters located in Seattle, Washington, and facilities located throughout the United States, including a facility located at 1200 West Main Street, Peoria, Illinois, herein called Respondent's facility, has been engaged in the retail sale of food and beverages.

(b) During the past 12 months Respondent, in conducting its business operations described above in paragraph 2(a), derived gross revenues in excess of \$500,000.

(c) During the past 12 months Respondent, in conducting its business operations described above in paragraph 2(a), purchased and received at its Peoria, Illinois, facilities goods valued in excess of \$5,000 directly from points outside the State of Illinois.

(d) At all material times Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

3. At all material times the Union has been a labor organization within the meaning of Section 2(5) of the Act.

4. At all material times the following individuals held the positions set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the Act and agents of Respondent within the meaning of Section 2(13) of the Act:

(b) (6), (b) (7)(C)  
(b) (6), (b) (7)(C)

5. (a) About (b) (6), (b) (7)(C) 2022, Respondent issued a written warning to its employee (b) (6), (b) (7)(C)

(b) About (b) (6), (b) (7)(C) 2022, Respondent disciplined its employee (b) (6), (b) (7)(C) by sending (b) (6), (b) (7)(C) home early.

(c) Respondent engaged in the conduct described above in paragraph 5(a) and 5(b) because the named employees of Respondent formed, joined, and assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

(d) Respondent engaged in the conduct described above in paragraph 5(a) because (b) (6), (b) (7)(C) was subpoenaed and intended to attend a Board proceeding in Case 25-RC-290625.

6. By the conduct described above in paragraphs 5(a) through 5(c), Respondent has been discriminating in regard to the hire or tenure or terms or conditions of employment of its employees, thereby discouraging membership in a labor organization in violation of Section 8(a)(1) and (3) of the Act.

7. By the conduct described above in paragraphs 5(a) and 5(d), Respondent has been discriminating against employees for filing charges or giving testimony under the Act in violation of Section 8(a)(1) and (4) of the Act.

8. The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

WHEREFORE, as part of the remedy for the unfair labor practices alleged above in paragraphs 5, 6, and 7, the General Counsel seeks an Order requiring, in addition to the conventional posting, that Respondent distribute a signed copy of the Administrative Law Judge's/Board's Notice in this matter:

(a) by posting it on its intranet or similar internal site, including the Starbucks Partner Hub, where it can be accessed by employees, supervisors, and managers;

(b) by emailing it to all current employees and former employees who were employed at Respondent's facility at any time since March 15, 2022;



(c) by sending it via any text-based mobile messaging platform (e.g. SMS, iMessage, WhatsApp, Snapchat, Kik, Slack, etc.) to all current employees and former employees who were employed at Respondent's facility at any time since March 15, 2022; and

(d) by emailing it to all supervisors and managers, including district managers, who have managed or supervised employees working at Respondent's facility at any time since March 15, 2022.

The General Counsel further seeks, as part of the remedy for the unfair labor practices alleged above in paragraphs 5, 6, and 7, that Respondent shall permit, within 60 days, representatives from the National Labor Relations Board to conduct training sessions via videoconference on employee rights under the National Labor Relations Act for the Respondent's managers and supervisors, including district managers, who have managed or supervised employees working at Respondent's facility at any time since March 15, 2022. The National Labor Relations Board will create the content of the training and the goal of that content will be to educate managers and supervisors on employee rights under the Act, with specific regard to the unfair labor practices alleged above in paragraphs 5, 6, and 7. The training session will last approximately one (1) hour. The Charged Party is responsible for all costs associated with the videoconference training.

The General Counsel further seeks all other relief as may be just and proper to remedy the unfair labor practices alleged.

#### ANSWER REQUIREMENT

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this**

**office on or before August 29, 2022.** Respondent also must serve a copy of the answer on each of the other parties.

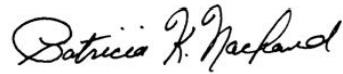
The answer must be filed electronically through the Agency's website. To file electronically, go to [www.nlr.gov](http://www.nlr.gov), click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. Responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See Section 102.21. If the answer being filed electronically is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the electronic version of an answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

### NOTICE OF HEARING

PLEASE TAKE NOTICE THAT on October 26, 2022, at 9:00 a.m. CT, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. The hearing will be conducted via videoconference using the Zoom for Government platform. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668.

The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated: August 15, 2022



---

PATRICIA K. NACHAND  
REGIONAL DIRECTOR  
NATIONAL LABOR RELATIONS BOARD  
REGION 25/SUBREGION 33  
101 SW Adams, 4<sup>th</sup> Floor  
Peoria, Illinois 61602

Attachments

UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
**NOTICE**

Case 25-CA-292501

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

Howard Schultz , President  
Starbucks Corporation  
2401 Utah Avenue South  
Seattle, WA 98134

Noah G. Lipschultz , Attorney  
Littler Mendelson, P.C.  
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Alice D. Kirkland , Esq.  
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Elizabeth Hanford , ESQ.  
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Suite 1100  
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Peter Demay  
Chicago and Midwest Regional Joint Board,  
Workers United/SEIU  
333 S. Ashland Ave  
Chicago, IL 60607

**(b) (6), (b) (7)(C)**

Starbucks Corporation  
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Peoria, IL 61606

Esau Chavez  
Chicago and Midwest Regional Joint Board,  
Workers United/SEIU  
333 S. Ashland Ave  
Chicago, IL 60607

Josiah Aeschliman Groff , Attorney  
Dowd, Bloch, Bennett, Cervone, Auerbach &  
Yokich, LLP  
8 S. Michigan Ave.  
1900  
Chicago, IL 60603

## Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: [www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules\\_and\\_regs\\_part\\_102.pdf](http://www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf).

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at [www.nlr.gov](http://www.nlr.gov), click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

**Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement.** The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

### I. BEFORE THE HEARING

The rules pertaining to the Board's pre-hearing procedures, including rules concerning filing an answer, requesting a postponement, filing other motions, and obtaining subpoenas to compel the attendance of witnesses and production of documents from other parties, may be found at Sections 102.20 through 102.32 of the Board's Rules and Regulations. In addition, you should be aware of the following:

- **Special Needs:** If you or any of the witnesses you wish to have testify at the hearing have special needs and require auxiliary aids to participate in the hearing, you should notify the Regional Director as soon as possible and request the necessary assistance. Assistance will be provided to persons who have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603.
- **Pre-hearing Conference:** One or more weeks before the hearing, the ALJ may conduct a telephonic prehearing conference with the parties. During the conference, the ALJ will explore whether the case may be settled, discuss the issues to be litigated and any logistical issues related to the hearing, and attempt to resolve or narrow outstanding issues, such as disputes relating to subpoenaed witnesses and documents. This conference is usually not recorded, but during the hearing the ALJ or the parties sometimes refer to discussions at the pre-hearing conference. You do not have to wait until the prehearing conference to meet with the other parties to discuss settling this case or any other issues.

### II. DURING THE HEARING

The rules pertaining to the Board's hearing procedures are found at Sections 102.34 through 102.43 of the Board's Rules and Regulations. Please note in particular the following:

- **Witnesses and Evidence:** At the hearing, you will have the right to call, examine, and cross-examine witnesses and to introduce into the record documents and other evidence.
- **Exhibits:** Each exhibit offered in evidence must be provided in duplicate to the court reporter and a copy of each of each exhibit should be supplied to the ALJ and each party when the exhibit is offered

**in evidence.** If a copy of any exhibit is not available when the original is received, it will be the responsibility of the party offering such exhibit to submit the copy to the ALJ before the close of hearing. If a copy is not submitted, and the filing has not been waived by the ALJ, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

- **Transcripts:** An official court reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the ALJ for approval. Everything said at the hearing while the hearing is in session will be recorded by the official reporter unless the ALJ specifically directs off-the-record discussion. If any party wishes to make off-the-record statements, a request to go off the record should be directed to the ALJ.
- **Oral Argument:** You are entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. Alternatively, the ALJ may ask for oral argument if, at the close of the hearing, if it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.
- **Date for Filing Post-Hearing Brief:** Before the hearing closes, you may request to file a written brief or proposed findings and conclusions, or both, with the ALJ. The ALJ has the discretion to grant this request and to will set a deadline for filing, up to 35 days.

### III. AFTER THE HEARING

The Rules pertaining to filing post-hearing briefs and the procedures after the ALJ issues a decision are found at Sections 102.42 through 102.48 of the Board's Rules and Regulations. Please note in particular the following:

- **Extension of Time for Filing Brief with the ALJ:** If you need an extension of time to file a post-hearing brief, you must follow Section 102.42 of the Board's Rules and Regulations, which requires you to file a request with the appropriate chief or associate chief administrative law judge, depending on where the trial occurred. You must immediately serve a copy of any request for an extension of time on all other parties and furnish proof of that service with your request. You are encouraged to seek the agreement of the other parties and state their positions in your request.
- **ALJ's Decision:** In due course, the ALJ will prepare and file with the Board a decision in this matter. Upon receipt of this decision, the Board will enter an order transferring the case to the Board and specifying when exceptions are due to the ALJ's decision. The Board will serve copies of that order and the ALJ's decision on all parties.
- **Exceptions to the ALJ's Decision:** The procedure to be followed with respect to appealing all or any part of the ALJ's decision (by filing exceptions with the Board), submitting briefs, requests for oral argument before the Board, and related matters is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be provided to the parties with the order transferring the matter to the Board.

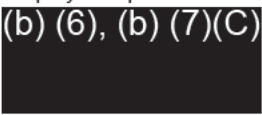
UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
25-CA-296190	05/20/2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Tel. No. (619) 632-7773
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) 1200 W Main Street  IL Peoria 61606	e. Employer Representative (b) (6), (b) (7)(C) 	g. e-mail (b) (6), (b) (7)(C)@starbucks.com
		h. Number of workers employed 15
		i. Type of Establishment (factory, mine, wholesaler, etc.) Restaurants
j. Identify principal product or service coffee		

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 3,1 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

--See additional page--

3. Full name of party filing charge (if labor organization, give full name, including local name and number)  
Esau Chavez

Chicago and Midwest Regional Joint Board, Workers United/SEIU

4a. Address (Street and number, city, state, and ZIP code)  333 S. Ashland Ave IL Chicago 60607	4b. Tel. No. (312) 738-6100
	4c. Cell No.
	4d. Fax No.
	4e. e-mail echavez@cmrjb.org

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

## 6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.



(signature of representative or person making charge)

Josiah Aeschliman Groff  
attorney

(Print/type name and title or office, if any)

8 S. Michigan Ave. 1900

Address Chicago IL 60603

Date 05/20/2022 02:36:13 PM

Tel. No.  
(312) 372-1361

Office, if any, Cell No.

Fax No.

e-mail  
JGroff@laboradvocates.com**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



## Basis of the Charge

### 8(a)(3)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) joined or supported a labor organization and in order to discourage union activities and/or membership.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
(b) (6), (b) (7)(C)	sent home	(b) (6), (b) (7)(C) 2022

### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by threatening to retaliate against employees if they joined or supported a union.

Name of Employer's Agent/Representative who made the statement	Approximate date
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) 2022

### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by denying an employee's request for union representation during an disciplinary investigation.

Approximate date representation was denied
(b) (6), (b) (7)(C) 2022



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 33  
101 SW Adams St  
Suite 400  
Peoria, IL 61602

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (309)671-7080  
Fax: (309)671-7095



Download  
NLRB  
Mobile App

May 23, 2022

Esau Chavez  
Chicago and Midwest Regional Joint Board,  
Workers United/SEIU  
333 S. Ashland Ave  
Chicago, IL 60607

Re: Starbucks Corporation  
Case 25-CA-296190

Dear Mr. Chavez:

The charge that you filed in this case on May 20, 2022 has been docketed as case number 25-CA-296190. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner TIFFANY L. MILLER whose telephone number is (309)218-1729. If this Board agent is not available, you may contact Assistant to the Regional Director COLLEEN MAPLES whose telephone number is (317)991-7646.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlrb.gov](http://www.nlrb.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you

fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

**Due to the nature of the allegations in the enclosed unfair labor practice charge, we have identified this case as one in which injunctive relief pursuant to Section 10(j) of the Act may be appropriate.** Therefore, in addition to investigating the merits of the unfair labor practice allegations, the Board agent will also inquire into those factors relevant to making a determination as to whether or not 10(j) injunctive relief is appropriate in this case. Accordingly, please include your position on the appropriateness of Section 10(j) relief when you submit your evidence relevant to the investigation.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case **MUST** be filed through the Agency's website, [www.nlrb.gov](http://www.nlrb.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlrb.gov](http://www.nlrb.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

PATRICIA K. NACHAND  
Regional Director

By: /s/Nathaniel E. Strickler

NATHANIEL E. STRICKLER  
Officer in Charge

cc: Josiah Aeschliman Groff, Attorney  
Dowd, Bloch, Bennett, Cervone,  
Auerbach & Yokich, LLP  
8 S. Michigan Ave. Ste. 1900  
Chicago, IL 60603



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 33  
101 SW Adams St  
Suite 400  
Peoria, IL 61602

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (309)671-7080  
Fax: (309)671-7095



Download  
NLRB  
Mobile App

May 23, 2022

(b) (6), (b) (7)(C)

Starbucks Corporation  
1200 W Main Street  
Peoria, IL 61606

Re: Starbucks Corporation  
Case 25-CA-296190

Dear (b) (6), (b) (7)(C)

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner TIFFANY L. MILLER whose telephone number is (309)218-1729. If this Board agent is not available, you may contact Assistant to the Regional Director COLLEEN MAPLES whose telephone number is (317)991-7646.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge by June 6, 2022. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the

investigation. In this way, the case can be fully investigated more quickly. **Due to the nature of the allegations in the enclosed unfair labor practice charge, we have identified this case as one in which injunctive relief pursuant to Section 10(j) of the Act may be appropriate.** Therefore, in addition to investigating the merits of the unfair labor practice allegations, the Board agent will also inquire into those factors relevant to making a determination as to whether or not 10(j) injunctive relief is appropriate in this case. Accordingly, please include your position on the appropriateness of Section 10(j) relief when you submit your evidence relevant to the investigation.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case **MUST** be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all

evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

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Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlrb.gov](http://www.nlrb.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

PATRICIA K. NACHAND  
Regional Director

By: /s/ Nathaniel E. Strickler

NATHANIEL E. STRICKLER  
Officer in Charge

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire

# NATIONAL LABOR RELATIONS BOARD NOTICE OF APPEARANCE

STARBUCKS CORPORATION,  <div style="text-align: right;">Employer,</div> <div style="text-align: center;">and</div> CHICAGO & MIDWEST REGIONAL JOINT BOARD, WORKERS UNITED/SEIU,  <div style="text-align: right;">Petitioner.</div>	
---	--

CASE NO.: 25-CA-296190

TO: (Check One Box Only)<sup>1</sup>

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> REGIONAL DIRECTOR<br>NATIONAL LABOR RELATIONS BOARD<br>Region 25<br>101 SW Adams Street<br>Suite 400<br>Peoria, IL 61602-1335 | <input type="checkbox"/> EXECUTIVE SECRETARY<br>NATIONAL LABOR RELATIONS BOARD | <input type="checkbox"/> GENERAL COUNSEL<br>NATIONAL LABOR RELATIONS BOARD |
|---|--|--|

**THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF**

Starbucks Corporation

**CHECK THE APPROPRIATE BOX(ES) BELOW:**

- ☒ REPRESENTATIVE IS AN ATTORNEY
- ☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASE HANDLING MANUAL.

*(REPRESENTATIVE INFORMATION)*

NAME Noah G. Lipschultz Esq.; Alice D. Kirkland, Esq.; Elizabeth Hanford, Esq.

MAILING ADDRESS Littler Mendelson, P.C., 80 South 8th Street, Suite 1300, Minneapolis, MN 55402; 321 North Clark Street, Suite 1100, Chicago, IL 60654

E-MAIL ADDRESS [nlipschultz@littler.com](mailto:nlipschultz@littler.com); [akirkland@littler.com](mailto:akirkland@littler.com); [ehanford@littler.com](mailto:ehanford@littler.com); [starbucksnlrb@littler.com](mailto:starbucksnlrb@littler.com)

OFFICE TELEPHONE NUMBER 612.313.7629; 612.313.7623; 312.795.3248

CELL PHONE NUMBER 773.750.8683; 612.801.5596; 708.490.8607 FAX 651.389.9135; 612.677.3205

SIGNATURE s/Alice D. Kirkland  
(Please sign in ink)

DATE June 1, 2022

4835-6507-9485.1 035682.1000

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.



NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Starbucks Corporation
and
Chicago and Midwest Regional Joint Board, Workers United/SEIU

CASE 25-CA-296190

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Starbucks Corporation


IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME:	Elizabeth Hanford
MAILING ADDRESS:	Littler Mendelson, PC, 321 North Clark Street, Suite 1100, Chicago, IL 60654
E-MAIL ADDRESS:	EHanford@littler.com; StarbucksNLRB@littler.com
OFFICE TELEPHONE NUMBER:	(312) 795-3248
CELL PHONE NUMBER:	(708) 490-8607
FAX:	312-372-7880
SIGNATURE:	
(Please sign in ink.)	
DATE:	August 1, 2022

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**AMENDED CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 25-CA-296190	Date Filed 08/12/2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer Starbucks Corporation		b. Tel. No. (619) 632-7773
		c. Cell No.
		f. Fax No.
		d. Address (Street, city, state, and ZIP code) 1200 W. Main St. Peoria, IL 61606
e. Employer Representative (b) (6), (b) (7)(C)		(b) (6), (b) (7)(C)@starbucks.com
		h. Number of workers employed 15
		i. Type of Establishment (factory, mine, wholesaler, etc.) Restaurant
j. Identify principal product or service coffee		

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

**2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)**

On or about (b) (6), (b) (7)(C) 2022, the Employer disciplined and retaliated against employee (b) (6), (b) (7)(C) by sending (b) (6) home from work because (b) (6) supported the Charging Party, a labor organization, in order to discourage union activities and/or membership.

**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**  
Chicago and Midwest Regional Joint Board, Workers United/SEIU

4a. Address (Street and number, city, state, and ZIP code)  333 S. Ashland Ave. Chicago, IL 60607		4b. Tel. No. (312) 738-6100
		4c. Cell No.
		4d. Fax No.
		4e. e-mail echavez@cmrjb.org

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)****6. DECLARATION**

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

/s/ *Jesiah A. Groff*

(signature of representative or person making charge)

Josiah Aeschliman Groff, attorney

(Print/type name and title or office, if any)

Tel. No.  
(312) 372-1361

Office, if any, Cell No.

Fax No.  
(312) 372-6599

e-mail  
jgroff@laboradvocates.com

Address 8 S. Michigan Ave., Suite 1900, Chicago, IL 60603

Date Aug 12, 2022

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 33  
101 SW Adams St  
Suite 400  
Peoria, IL 61602

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (309)671-7080  
Fax: (309)671-7095



Download  
NLRB  
Mobile App

August 16, 2022

Esau Chavez  
Chicago and Midwest Regional  
Joint Board, Workers United/SEIU  
333 S. Ashland Ave  
Chicago, IL 60607

Re: Starbucks Corporation  
Case 25-CA-296190

Dear Mr. Chavez:

We have docketed the first amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Examiner TIFFANY L. MILLER whose telephone number is (309)218-1729. If the agent is not available, you may contact Assistant to the Regional Director COLLEEN MAPLES whose telephone number is (317)991-7646.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlr.gov](http://www.nlr.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

PATRICIA K. NACHAND  
Regional Director

By: /s/ Nathaniel E. Strickler

NATHANIEL E. STRICKLER  
Officer in Charge

cc: Josiah Aeschliman Groff, Attorney  
Dowd, Bloch, Bennett, Cervone,  
Auerbach & Yokich, LLP  
8 S. Michigan Ave.  
1900  
Chicago, IL 60603



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 33  
101 SW Adams St  
Suite 400  
Peoria, IL 61602

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (309)671-7080  
Fax: (309)671-7095



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August 16, 2022

(b) (6), (b) (7)(C)

Starbucks Corporation  
1200 W Main Street  
Peoria, IL 61606

Re: Starbucks Corporation  
Case 25-CA-296190

Dear (b) (6), (b) (7)(C)

Enclosed is a copy of the first amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Examiner TIFFANY L. MILLER whose telephone number is (309)218-1729. If the agent is not available, you may contact Assistant to the Regional Director COLLEEN MAPLES whose telephone number is (317)991-7646.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the

Agency's web site ([www.nlr.gov](http://www.nlr.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

PATRICIA K. NACHAND  
Regional Director

By: /s/ Nathaniel E. Strickler

NATHANIEL E. STRICKLER  
Officer in Charge

Enclosure: Copy of first amended charge

cc: Noah G. Lipschultz, Attorney  
Littler Mendelson, P.C.  
80 South 8th Street, Suite 1300  
Minneapolis, MN 55402-2136

Alice D. Kirkland, Esq.  
Littler Mendelson, P.C.  
80 South 8th Street,  
Suite 1300  
Minneapolis, MN 55402-2136

Elizabeth Hanford  
321 N. Clark Street  
Suite 1100  
Chicago, IL 60654

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 25-CA-298682	Date Filed 07/05/2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer  Starbucks Corporation		b. Tel. No. (309) 692-0151
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code)  707 W Pioneer Prkwy Peoria IL 61615	e. Employer Representative  (b) (6), (b) (7)(C)	g. e-mail
h. Number of workers employed 25		
i. Type of Establishment (factory, mine, wholesaler, etc.) Retailer		
j. Identify principal product or service Coffee		

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

**2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)**

Within the past six months, the Employer has interfered with, restrained, and coerced employees by conducting mandatory captive audience meetings and threatening employees with job loss and loss of pay and benefits if they selected the Union as their representative.

**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**  
Chicago & Midwest Regional Joint Board, Workers United/SEIU

4a. Address (Street and number, city, state, and ZIP code)  333 S Ashland Ave., Chicago, IL 60607	4b. Tel. No. 312-738-6100
	4c. Cell No.
	4d. Fax No.
	4e. e-mail

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)**  
Workers United/SEIU**6. DECLARATION**

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

*Robert S Cervone*

Robert S Cervone

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Tel. No.  
312-801-8848

Office, if any, Cell No.

Fax No.

e-mail  
rcervone@laboradvocates.com

Address 8 S Michigan Ave., 1900, Chicago IL 60603

Date Jul 1, 2022

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.





UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 33  
101 SW Adams St  
Suite 400  
Peoria, IL 61602

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (309)671-7080  
Fax: (309)671-7095



Download  
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Mobile App

July 5, 2022

(b) (6), (b) (7)(C)

Starbucks Corporation  
707 West Pioneer Parkway  
Peoria, IL 65615

Re: Starbucks Corporation  
Case 25-CA-298682

Dear (b) (6), (b) (7)(C)

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner TIFFANY L. MILLER whose telephone number is (309)218-1729. If this Board agent is not available, you may contact Assistant to the Regional Director COLLEEN MAPLES whose telephone number is (317)991-7646.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlrb.gov](http://www.nlrb.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge by July 19, 2022. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not

have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

PATRICIA K. NACHAND  
Regional Director

By: /s/ Nathaniel E. Strickler

NATHANIEL E. STRICKLER  
Officer in Charge

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire

cc: (b) (6), (b) (7)(C)  
Starbucks Corporation  
707 W Pioneer Parkway  
Peoria, IL 61615



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 33  
101 SW Adams St  
Suite 400  
Peoria, IL 61602

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (309)671-7080  
Fax: (309)671-7095



Download  
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Mobile App

July 5, 2022

Chicago & Midwest Regional Joint Board,  
Workers United/SEIU  
333 Ashland Ave  
Chicago, IL 60607

Re: Starbucks Corporation  
Case 25-CA-298682

Dear Sir or Madam:

The charge that you filed in this case on July 05, 2022 has been docketed as case number 25-CA-298682. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner TIFFANY L. MILLER whose telephone number is (309)218-1729. If this Board agent is not available, you may contact Assistant to the Regional Director COLLEEN MAPLES whose telephone number is (317)991-7646.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlrb.gov](http://www.nlrb.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

PATRICIA K. NACHAND  
Regional Director

By: /s/ Nathaniel E. Strickler

NATHANIEL E. STRICKLER  
Officer in Charge

cc: Robert S. Cervone, Attorney  
Dowd Bloch Bennet Cervone Auerbach &  
Yokich LLP  
8 South Michigan Avenue, Suite 1900  
Chicago, IL 60603-3315

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

STARBUCKS CORPORATION
and
CHICAGO AND MIDWEST REGIONAL JOINT BOARD, WORKERS UNITED/SEIU

CASE 25-CA-298682

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Noah G. Lipschultz	
MAILING ADDRESS: 1300 IDS Center, 80 S. 8th Street, Minneapolis, MN 55402	
E-MAIL ADDRESS: nlipschultz@littler.com, starbucksnlrb@littler.com	
OFFICE TELEPHONE NUMBER: 612-630-1000	
CELL PHONE NUMBER: _____	FAX: _____
SIGNATURE: s/ Noah G. Lipschultz	
(Please sign in ink.)	
DATE: July 8, 2022	

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

STARBUCKS CORPORATION

and

CHICAGO AND MIDWEST REGIONAL JOINT BOARD,  
WORKERS UNITED/SEIU

CASE 25-CA-298682

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Starbucks Corporation

IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

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(REPRESENTATIVE INFORMATION)

NAME: Elizabeth Hanford

MAILING ADDRESS: 321 North Clark Street, Suite 1100, Chicago, IL 60654

E-MAIL ADDRESS: ehanford@littler.com; starbucksnlrb@littler.com

OFFICE TELEPHONE NUMBER: 312-372-5520

CELL PHONE NUMBER: \_\_\_\_\_ FAX: \_\_\_\_\_

SIGNATURE: s/ Elizabeth Hanford

DATE: July 8, 2022  
(Please sign in ink.)

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.